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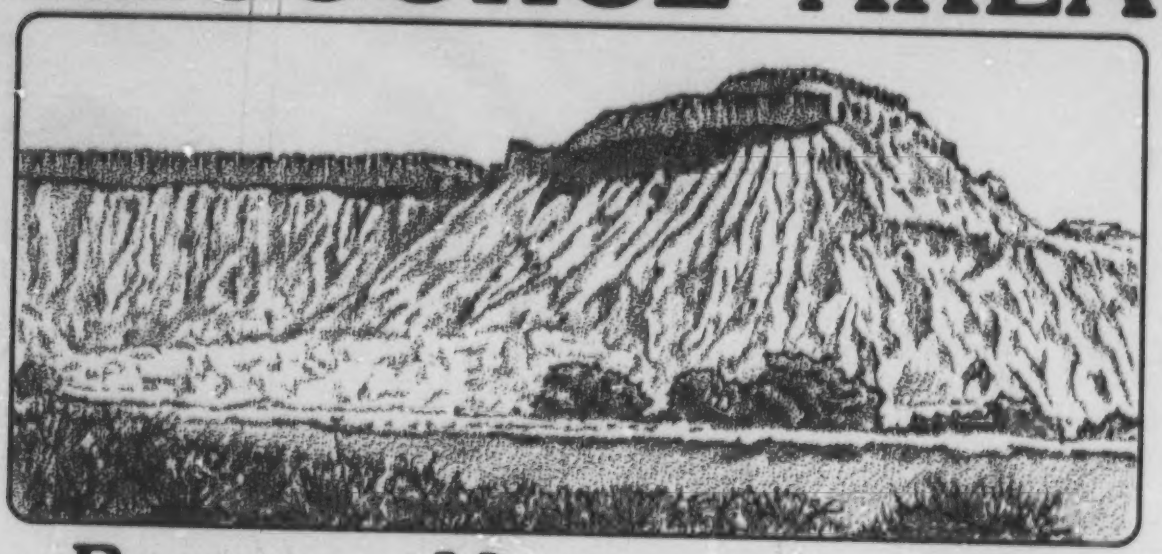
GRAND JUNCTION RESOURCE AREA



Resource Management Plan
and Environmental Impact Statement

U.S. Department of the Interior
Bureau of Land Management
Grand Junction District
Colorado

I 1.98:

Colorado State Office
2020 Arapahoe Street
Denver, Colorado 80205

NOTICE

Enclosed for your review is the proposed resource management plan (RMP) and final environmental impact statement (FEIS) for the Grand Junction Resource Area. The proposed resource management plan, hereinafter referred to as the Proposed Plan, is a refinement of the Preferred Alternative presented in the draft resource management plan and environmental impact statement published in March 1985. The Proposed Plan is the BLM's proposed action. The proposed RMP and final EIS is published in an abbreviated format and is designed to be used in conjunction with the draft RMP EIS released in March 1985.

With the exception of the wilderness recommendations for the seven wilderness study areas and the proposed approval of ten pending applications for permit to drill, all parts of this Proposed Plan may be protested in accordance with the planning regulations, 43 CFR 1610.5-2. Protests shall be in writing and sent to the Director (202), Bureau of Land Management, 1800 C Street, N.W., Washington, DC 20240, prior to December 16, 1985 - the end of the 30-day protest period. The protest shall include the following information:

The name, mailing address, telephone number, and interest of the person filing the protest.

A statement of the issue or issues being protested.

A statement of the part or parts of the plan being protested.

A copy of all documents addressing the issue or issues that were submitted during the planning process by the protesting party, or an indications of the date the issue or issues were discussed for the record.

A concise statement explaining why the proposed decision is believed to be wrong.

The proposal to approve the ten pending applications for permit to drill in the Little Book Cliffs area cannot be protested as outlined above. These proposed approvals may be protested in accordance with 43 CFR 4.450-2. Protests on the approval of the applications for permit to drill shall be in writing and sent to the District Manager, Bureau of Land Management, Grand Junction District, 764 Horizon Drive, Grand Junction, CO 81506. The protest should include the name and mailing address of the person filing the protest and a concise statement explaining why the proposed decision is believed to be wrong.

At the end of the 30-day protest period, and after the Governor's consistency review, the Proposed Plan, excluding any portions under protest, shall become final. Approval shall be withheld on any portion of the Proposed Plan under protest until final action has been completed on such protest. The record of decision and final resource management plan will be issued no later than May 1986.

Sincerely yours,

Jannon Rochelle

State Director

PROPOSED RESOURCE MANAGEMENT PLAN
AND
FINAL ENVIRONMENTAL STATEMENT

GRAND JUNCTION RESOURCE AREA

Prepared by
U. S. Department of the Interior
Bureau of Land Management

Kannon Richards

STATE DIRECTOR
COLORADO STATE OFFICE

READEX
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PROPOSED RESOURCE MANAGEMENT PLAN
AND
FINAL ENVIRONMENTAL IMPACT STATEMENT

Draft ( ) Final (X)

GRAND JUNCTION RESOURCE AREA
GRAND JUNCTION, COLORADO

Lead Agency

U.S. Department of the Interior, Bureau of Land Management

Type of Action

Administrative (X) Legislative ( )

ABSTRACT

This proposed resource management plan and final environmental impact statement responds to public comments on the Draft Grand Junction Resource Management Plan and Environmental Impact Statement (draft RMP EIS). It corrects errors made in the draft RMP EIS. It also makes changes to the draft RMP EIS Preferred Alternative based on public comment. This final RMP EIS incorporates by reference the contents of the draft RMP EIS which was sent to you earlier this year. Therefore, this final RMP EIS must be used in conjunction with the draft RMP EIS.

For further information regarding this final resource management plan and environmental impact statement contact:

Forest Littrell, Area Manager
Bureau of Land Management
Grand Junction Resource Area
764 Horizon Drive
Grand Junction, CO 81506
Telephone (303) 243-6552

Date by Which Protest Must Be Received: December 16, 1985

DISTRIBUTION LIST

The following agencies and interest groups have been sent copies of this proposed resource management plan and final environmental impact statement.

Federal Agencies

Advisory Council on Historic Preservation

Department of the Interior

- Bureau of Reclamation
- Fish and Wildlife Service
- National Park Service
- Office of Surface Mining
- Craig District, Bureau of Land Management
- Montrose District, Bureau of Land Management
- Moab District, Bureau of Land Management

Department of Energy

Environmental Protection Agency

Department of Agriculture

- Agricultural Stabilization and Conservation Service
- Forest Service
- Soil Conservation Service

Western Area Power Administration

Colorado State Agencies

Colorado Division of Planning—State Clearing House

Colorado Division of Wildlife, Northwest Region

Colorado Division of Wildlife, Southwest Region

University of Colorado

Colorado State University

State Historic Preservation Officer

Local Governments

Associated Governments of Northwest Colorado

Delta, Garfield, Grand (Utah), Mesa, and Montrose County Commissioners and Planning Departments

Cities and Towns of Collbran, De Beque, Fruita, Grand Junction, and Palisade

Other Organizations

American Petroleum Institute

Audubon Society of Western Colorado

Club 20

Colorado Association of Soil Conservation Districts

Colorado Association of 4-Wheel Drive Clubs

Colorado Cattlemen's Association

Colorado Guide and Outfitters Association

Colorado Mining Association

Colorado Open Space Council

Colorado Outward Bound

Colorado Wool Growers Associati

Federal Land Bank Association

Friends of the Earth

Friends of the Mustangs

Holy Cross Cattlemen's Association

Independent Petroleum Association of Mountain States

League of Women Voters

Mesa County Cattlemen's Association

Mesa County Wool Growers Association

National Audubon Society

Production Credit Association of Northwest Colorado

Rocky Mountain Oil and Gas Association

Sierra Club

The Wilderness Society

Trout Unlimited

Western Colorado Congress

Numerous organizations and individuals expressing interest also have been sent copies of this proposed plan and final environmental impact statement.

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INTRODUCTION

INTRODUCTION

INTRODUCTION

This is the proposed resource management plan (RMP) and final environmental impact statement (final EIS) for the Grand Junction Resource Area. This document contains a summary of the proposed resource management plan, which is a modified version of the draft environmental impact statement (draft EIS) Preferred Alternative. This document also contains public comments, responses, changes, and corrections to the draft RMP EIS.

The changes to the draft RMP EIS Preferred Alternative were made in response to public comments and further refinement by BLM. Following is a summary of the major changes:

Oil and Gas Management. Three stipulations—two for protection of threatened and endangered species and one to limit soil erosion on steep slopes—were reworded. These stipulations were reworded for clarity.

Wild Horse Management. The wild horse range boundary shown on Map 5, the draft RMP EIS was changed to correct an error. The current boundary is shown on Map 13 in this document.

Recreation Management. Recommendations to manage the Dolores River and Ruby Canyon under scenic river guidelines were reworded. The new recommendations simply state how the river would be managed without reference to the scenic river management guidelines. Also, the segment of the Dolores River recommended for management was expanded to include the section from the district line to the state line. Another change involving river management is to recommend all commercial floatboat operators obtain river use permits. The need for private user permits would be analyzed in activity plans.

Off-Road Vehicle Management. Two new areas totaling 1,000 acres have been recommended as open group use areas and as acceptable for competitive events. One area is located on 18 Road north of Fruita, and the other is located on 25 Road west of the airport.

Wilderness Management. About 19,000 acres were added to the area recommended for wilderness designation in Dominguez Canyon Wilderness Study Area (WSA). The recommended Dominguez Canyon WSA boundaries are shown on Maps 2 and 3 in this document.

Special Management Areas. All areas recommended for outstanding natural area or research natural area designation have also been recommended for area of critical environmental concern designation. The Badger Wash uplands area has been added to the list of areas recommended for area of critical environmental concern management. The Palisade Outstanding Natural Area has been expanded from about 1,900 acres to about 19,000 acres.

Land Tenure Adjustments. A cooperative management agreement category has been added to the land tenure adjustment categories. Fourteen tracts containing riparian and recreation values lying adjacent to the Colorado and Gunnison Rivers would be offered to qualified agencies or interest groups for management or exchange. These tracts would be retained should they not be transferred to another agency or group.

Ten tracts (13, 24, 42D, 416, 421, 422, 423, 424, 427, and 429) previously identified for disposal have been placed in the retention category. Six tracts (139, 162, 330, 331, 341, and 342) previously identified for retention have been placed in the disposal category.

SUMMARY OF PROPOSED PLAN

SUMMARY OF PROPOSED PLAN

This section summarizes the Proposed Plan. The Proposed Plan is a modified version of the draft EIS Preferred Alternative.

Air Quality Management

Existing air quality in the resource area would be maintained within the designated nonattainment area through project design.

Soils Management

Projects on suitable soils would be designed to minimize soil loss. In the Baxter/Douglas Pass area, 18,000 acres would be managed to exclude surface occupancy and limit surface disturbance because of high soil slump hazard. In the Cactus Park area, 1,000 acres of critically-eroding soils would be stabilized by limiting access and reseeding. Surface occupancy and disturbance would be limited on steep slopes (those over 40 percent).

Water Resources Management

The primary emphasis of water resources management would be to reduce salinity and sediment yield from the Grand Valley. Other actions would include stabilizing about 63 miles of severely-eroding stream channels, protecting municipal watersheds, and continuing the Badger Wash hydrologic research project and the Sinbad salinity control study.

Locatable Minerals Management

An additional 171,320 acres would be recommended for withdrawal from mineral entry. This includes the areas recommended for wilderness designation and a section of the Colorado River downstream from the Loma launch site.

Coal Management

Approximately 390,000 acres of the Book Cliffs potential coal development area would be identified as acceptable for further coal leasing consideration. The Palisade municipal watershed and the Colorado River corridor through De Beque Canyon would be excluded. Actual leasing would be analyzed in a separate environmental impact statement at some point in the future.

Oil and Gas Management

Approximately 10 percent of the resource area would be closed to oil and gas leasing and development (the areas recommended suitable for wilderness designation). Approximately 9 percent would be made available with no surface occupancy, and about 38 percent would be made available with other stipulations to protect sensitive resources. The remaining 43 percent would be open to oil and gas leasing with standard lease terms.

Mineral Materials Management

Existing closures to mineral materials sales on 6,188 acres would continue. An additional 305,429 acres would be closed to protect a variety of resource values.

Paleontological Resource Management

The Morrison and Wasatch Formations would be designated as Class I paleontological areas. Outcrops of these formations would be surveyed prior to approval of surface-disturbing activities. The Fruita and Rabbit Valley paleontological sites would continue to be managed for scientific and educational purposes. These sites would also be designated as research natural areas and areas of critical environmental concern.

Forest Management

Fuelwood harvesting would increase about 8 percent to 2,800 cords per year on about 111,000 acres. Most fuelwood harvesting areas would be designed to benefit wildlife. Timber sales on commercial forest land would be limited to 1,319 acres until completion of a timber production capability classification.

Summary of Proposed Plan

Wildlife Management

Deer, elk, and bighorn sheep would be the major species managed on about 80 percent of the resource area. Other species that would receive management emphasis are wild turkey, grouse, bear, pronghorn, and waterfowl. About 70 miles of stream would be managed to improve or maintain sport fisheries.

Threatened and Endangered Species Management

Habitat of unique, sensitive, threatened and endangered plants and animals would be identified for active management and protection. Unaweep Seep, Pyramid Rock, and Badger Wash Uplands would be designated as special management areas.

Livestock Grazing Management

Livestock grazing, as described in the *Grand Junction Grazing Management Environmental Statement*, would continue. Allotment management plans (AMPs) would be reevaluated to ensure that AMP objectives and practices are consistent with the resource management plan decisions and objectives for riparian and critical erosion areas. Where necessary, appropriate changes will then be made in AMPs and new grazing decisions or agreements developed to institute the appropriate changes in grazing use.

Wild Horses Management

The Little Book Cliffs Wild Horse Range would be expanded by 2,380 acres on the face of the Book Cliffs. This expansion is historical winter range above the old town of Carpenter. Development of existing coal leases could reduce the available winter range and wild horse herd by 10 percent. Any future leasing would have to ensure that a viable horse herd would remain. Coal Canyon is the likely place for any future coal facilities. This area is critical winter range and the primary foaling area. Coal Canyon would be designated a utility corridor for power lines only.

Cultural Resource Management

Eight sites covering about 11,600 acres would be actively managed as high value cultural resources. Active management includes inventory, stabilization, and protection from surface-disturbing activities.

Recreation Resource Management

Three areas covering 275,000 acres would be managed as intensive recreation management areas (IRMA). The Grand Valley would be managed primarily for off-road vehicle use, but emphasis would be placed upon reducing conflicts between various user groups. (This includes portions of the Gunnison River and the Bang's Canyon area.) The Gateway IRMA would be managed primarily for backcountry recreation, and Ruby Canyon would be managed to provide for river recreation.

Visual Resource Management

About 12 percent of the resource area would be designated visual resource management (VRM) Class I. This includes the areas recommended for wilderness designation and visual resources of high importance such as Mount Garfield, The Palisade, and the cliffs of Sinbad Valley. About 22 percent of the resource area would be designated either VRM Class II or Class III. This includes areas where visual resources are important but not the dominant use. A majority of the area, about 65 percent, would not be placed in a visual resource management class.

Off-Road Vehicle Management

About 37 percent of the resource area would be designated as open to off-road vehicle use. This includes about 11,000 acres between the airport and Mount Garfield and two small areas on 18 and 25 Roads that would be used for competitive events and intensive off-road vehicle activities. About 12 percent of the resource area would be closed to off-road vehicle use. This includes the four areas recommended for wilderness designation and Mount Garfield. The remaining 50 percent of the area would have some type of limitation on vehicle use to protect sensitive values.

Wilderness Management

Four of the seven wilderness study areas (WSAs) totaling 166,340 acres would be recommended suitable for wilderness designation. They are Black Ridge Canyons, Black Ridge Canyons West, Dominguez Canyon, and Sewemup Mesa. Black Ridge Canyons and Black Ridge Canyons West would be managed as one unit. Demaree Canyon, Little Book Cliffs, The Palisade WSAs, and small portions of Dominguez Canyon and Sewemup Mesa would be recommended nonsuitable for wilderness designation. A total of 77,425 acres would be recommended nonsuitable.

Special Management Areas Management

Six areas covering about 2,500 acres would be designated research natural areas (RNAs). Unaweep Seep and Pyramid Rock would be managed to protect sensitive plants and an endangered plant, respectively. The Fruita and Rabbit Valley paleontological sites would be managed for scientific and educational purposes. The Gunnison Gravels would be managed to protect evidence that the Gunnison River once flowed through Unaweep Canyon. Rough Canyon would be managed to protect endangered plants, scenic values, and cultural resources. About 19,178 acres of The Palisade would be designated as an outstanding natural area (ONA). The Palisade ONA would be managed to protect natural, geologic, and scenic values. All areas designated RNA or ONA would also be designated as areas of critical environmental concern (ACEC). The Badger Wash Uplands would be designated an ACEC and managed to protect sensitive plants and for hydrologic research.

Land Tenure Adjustments

Approximately 140 tracts of public land totaling about 25,000 acres would be identified for disposal. This represents about 2 percent of the resource area. These tracts are isolated from other public land and are difficult to manage. Methods of disposal would be identified later and could include exchanges, cooperative agreements, direct sales, and competitive sales.

Fourteen tracts covering about 1,360 acres would be placed in a cooperative management agreement category and offered to appropriate agencies, local governments, or qualified environmental groups for transfer or management under a cooperative management agreement.

Eight tracts of private land covering about 1,900 acres would be identified for acquisition. Acquisition would depend on the private landowner's willingness to sell. This includes private land in the Little Book Cliffs Wild Horse Range, Dominguez Canyon WSA, and the Loma launch site.

Transportation Management

Thirty-five separate easements would be recommended for acquisition. Most of these recommendations would be implemented directly from the RMP, but a number of proposals in the Roan Creek and Douglas Pass areas would require additional study. About half of the easement acquisition proposals occur at points where public access is presently provided or could be provided through construction of a road or trail around the private property.

Public Utilities Management

Eight routes containing existing public utilities would be designated as corridors. Coal Canyon would be designated a corridor for power lines only, and a small utility corridor would be designated on the west side of the Colorado National Monument to serve residents of Glade Park. Also, the entire resource area would be identified as suitable, sensitive, or unsuitable for public utilities.

Fire Management

Fire on public land would be managed as directed by the fire response levels for critical (18,950 acres), prescribed (27,000 acres), and wilderness (166,340 acres) areas. These three levels support the objectives of the resources in these areas. The remaining acreage within the resource area will be analyzed through fire management plans to determine proper response levels for the resource objectives identified.

PUBLIC COMMENTS

PUBLIC COMMENTS

PUBLIC COMMENTS

ANALYSIS AND REVIEW PROCEDURES

The draft RMP EIS was filed with the Environmental Protection Agency on April 5, 1985. A notice of availability and a public hearing announcement, published in the April 1 *Federal Register*, announced a 90-day public comment period ending July 3, 1985. A notice of extension of public comment period and supplement to the April 1, 1985, *Federal Register* was published in the June 21, 1985, *Federal Register*. This notice extended the ending date of the comment period from July 3, 1985, to July 17, 1985.

Over 1,000 copies of the draft RMP EIS were mailed to federal, state, and local governments, private groups and organizations, and individuals for review and comment. News releases provided information on how to obtain copies of the draft RMP EIS and where it could be reviewed. Formal public hearings were held in Grand Junction, Gateway, Delta, and Denver on May 13, 14, 15, and 20 respectively.

Comments on the draft RMP EIS were requested from the following agencies and interest groups. Those who responded are indicated by an asterisk.

Federal Agencies

Advisory Council on Historic Preservation

Department of the Interior

- Bureau of Reclamation*
- Fish and Wildlife Service*
- National Park Service*
- Office of Surface Mining*
- U.S. Geologic Survey
- Craig District, Bureau of Land Management
- Montrose District, Bureau of Land Management
- Moab District, Bureau of Land Management
- Oil Shale Projects Office

Department of Energy

Environmental Protection Agency*

Department of Agriculture

- Agriculture Stabilization and Conservation Service
- Forest Service
- Soil Conservation Service

Western Area Power Administration

Colorado State Agencies

Colorado Division of Wildlife*

Colorado Division of Planning-State Clearing House

University of Colorado

Colorado State University

Local Governments

Associated Governments of Northwestern Colorado

Delta, Garfield, Grand (Utah), Mesa, and Montrose County Commissioners and Planning Departments*

Cities and Towns of Collbran, De Beque, Fruita, Grand Junction and Palisade

Other Organizations

American Petroleum Institute

Audubon Society of Western Colorado*

Club 20

Colorado Association of Soil Conservation Districts

Colorado Association of 4-Wheel Drive Clubs

Colorado Cattlemen's Association

Colorado Outfitters Association

Colorado Mining Association

Colorado Open Space Council*

Colorado Outward Bound

Colorado Wool Growers Association

Federal Land Bank Association

Friends of the Earth*

Friends of the Mustang

Holy Cross Cattlemen's Association

Independent Petroleum Association of Mountain States*

League of Women Voters

Mesa County Cattlemen's Association

Mesa County Wool Growers Association

National Audubon Society*

Production Credit Association of Northwest Colorado

Rocky Mountain Oil and Gas Association*

Sierra Club*

The Wilderness Society

Trout Unlimited

Western Colorado Congress

COMMENTERS

Thirty-eight persons testified at public hearings, and 92 persons, groups, or agencies submitted letters on the draft RMP EIS. Tables 1 and 2 list these commenters. The speakers and letters are numbered sequentially in the order in which they were received.

Table 1. Speakers at Public Hearings

Commenter Number[1]	Individual, Group, or Agency	Response Number[2]
A-1	Clifford Bailey, Palisade, Colorado	200
A-2	Ed Jones, Grand Junction, Colorado	200
A-3	R. D. Jacks, Grand Junction, Colorado	201
A-4	Miles Keogh, Glade Park, Colorado (Mountain Island Ranch)	
A-5	Bill Prather, De Beque, Colorado	78, 79, 80, 81, 82, 83, 154, 155, 159, 286
A-6	John Musser, Delta, Colorado	173, 202
A-7	Russell D. Weber, Grand Junction, Colorado (Orchard Mesa Gun Club)	174
A-8	Gerry Stuart, Grand Junction, Colorado	200
A-9	Ralph Stuart, Grand Junction, Colorado (Grand Junction Gem and Mineral Club)	175
A-10	Henry Barbe, Grand Junction, Colorado (Powderhorn Coal Co.)	21, 22, 23, 24, 25
A-11	Ted Hatzenbuhler, Fruita, Colorado	287
A-12	Glen Miller, Grand Junction, Colorado	242
A-13	Mark Pearson, Grand Junction, Colorado (Colorado Open Space Council)	26, 110, 176, 177, 203, 204, 243, 244
A-14	Sharyl Kinnear, Grand Junction, Colorado (Sierra Club)	164, 176, 203, 205, 206
A-15	Sue Kupelian, Grand Junction, Colorado (Grand Junction Off-Road Coalition and Grand Junction Cycle Board)	191, 192
A-16	John Thomas, Grand Junction, Colorado	177, 203, 205
A-17	H. R. Goodner, Grand Junction, Colorado	200
A-18	John Ballagh, Grand Junction, Colorado	242
A-19	C. R. Wenger, Grand Junction, Colorado	160
B-1	Lyman Hubbard, Gateway, Colorado (Hubbard Mining)	205, 207
B-2	Paul T. Peterson, Grand Junction, Colorado	
C-1	Lawrence Papp, Parker, Colorado (Sierra Club)	177, 203
C-2	Rocky Smith, Denver, Colorado	203, 204, 208
C-3	Daryl Anderst, Denver, Colorado	209
C-4	Jim Bock, Denver, Colorado	
C-5	Martin Walter, Boulder, Colorado	177
C-6	Susan Hamilton, Boulder, Colorado	
C-7	Dorothy Cohen, Boulder, Colorado	
C-8	N. J. Mullen, Boulder, Colorado (Colorado Rivers Coalition)	177, 208, 210, 211
C-9	Linda Batlin, Boulder, Colorado (Rocky Mountain Chapter Sierra Club)	27, 69, 72, 156, 193, 245, 246
C-10	Rosalind McClellan, Boulder, Colorado	27, 178, 179, 203, 205, 212, 240, 247, 248
C-11	Merry Havens, Boulder, Colorado	177, 203, 205, 213
C-12	Gary Brenner, Boulder, Colorado	205
C-13	David Mastronarde, Boulder, Colorado (Indian Peaks Group, Sierra Club)	
C-14	Nicholas Brown, Boulder, Colorado (Colorado University Wilderness Study Group)	203, 214
C-15	Kathy Hands, Boulder, Colorado	177, 205
C-16	Jill Janine Smith, Boulder, Colorado (Southwest Regional Office, Sierra Club)	177, 203
C-17	Christa C. Coleman, Boulder, Colorado (Colorado University Wilderness Study Group	

[1]These alphanumeric designators identify the commenter. They appear in the upper right corner of the testimony and also in the Response section.

[2]These numbers are used to identify the response to a comment. They appear in the margins of the letters and also in the Response section.

Table 2. Letter Commenters

Commenter Number[1]	Individual, Group, or Agency	Response Number[2]
1	Department of the Air Force, Dallas, Texas	
2	J. R. Stringham, Tucson, Arizona	
3	Bob Ratcliffe, Grand Junction, Colorado	215 216
4	Jill Janine Smith, Boulder, Colorado	177, 203, 217
5	Mesa County Parks, Grand Junction, Colorado	
6	Bill Rambo, Delta, Colorado	
7	Andrew McConkey, Boulder, Colorado	
8	Musser Ranches, Delta, Colorado	177, 217
9	Nina Johnson, Boulder, Colorado	218
10	John M. Chaplick, Havenhill, Massachussetts	203, 204
11	Marvin Brown, Clifton, Colorado	27
12	Ken Berg, Aurora, Colorado	192
13	John P. Femal, Kaukauna, Wisconsin	180, 217
14	Martha Nesbitt, Boulder, Colorado	208
15	Stan Ferris, Clifton, Colorado	177, 203, 204, 205, 208
16	Shell Minerals Corporation, Houston, Texas	177, 181, 219
17	John Trammell, Grand Junction, Colorado	249, 250, 251, 252, 253, 254
18	M. S. Caton, Denver, Colorado	54, 203, 255, 288
19	James Messano, Delta, Colorado	217
20	Penny Hope, Boulder, Colorado	220
21	Richard Hughes, Chevron USA, Denver, Colorado	177, 180, 203, 217
22	The Nature Conservancy, Denver, Colorado	111, 112, 113, 114, 115, 116, 117, 118, 240, 241, 256, 299
23	Harry Melts, Porthill, Idaho	192, 257
24	Bureau of Reclamation, Salt Lake City, Utah	131, 221, 242, 258, 259
25	Gerald Audesirk, Thorton, Colorado	204, 205, 222
26	Gilbert Wenger, Grand Junction, Colorado	160
27	Lawrence Papp, Parker, Colorado	177, 203, 204, 205, 222
28	Sierra Club, Seattle, Washington	177, 203, 205, 223
29	Mesa County Planning Department, Grand Junction, Colorado	188, 194, 224, 242, 245, 246, 260, 261
30	James R. Guadagno, Ridgway, Colorado	205, 213
31	National Park Service, Rocky Mountain Region, Denver, Colorado	
32	Randall Shepard, Austin, Colorado	
33	John Swanson, Berkeley, California	
34	Garfield County Commissioners, Glenwood Springs, Colorado	289
35	Carolyn Beezley, Boulder, Colorado	177, 180, 203, 204, 205
36	A. James Rosenthal, Norwood, Colorado	177, 180, 203, 217
37	Cleveland-Cliffs, Western Division, Rifle, Colorado	262, 263, 264, 265, 266, 267, 268, 303, 304
38	Robert Schreiner, Jr., Englewood, Colorado	203, 204, 205
39	William S. Greer, Houston, Texas	177, 203, 204, 205
40	Mike Figgs, Boulder, Colorado	111, 205, 256
41	Julie J. Studer, Alamosa, Colorado	203
42	R. Anderson, Amoco Production Company, Denver Region, Denver, Colorado	
43	Board of County Commissioners, Delta County, Delta, Colorado	224
44	Timothy Armstrong	84, 85, 86, 256, 263
45	Earl W. Williams, Palisade, Colorado	177, 180, 203, 205
46	Robert O. Byron, Casper, Wyoming	
47	F. Ann McKinney, Coburg, Oregon	177, 180, 203, 204
48	E. Fred Birdsall, Comoco Inc., Denver, Colorado	
49	Richard D. Clark, Grand Junction, Colorado	
50	Connelly Exploration Inc., Denver, Colorado	

Table 2. Letter Commenters—Continued

Commenter Number[1]	Individual, Group, or Agency	Response Number[2]
51	U.S. Fish and Wildlife Service, Assistant Field Supervisor, Golden, Colorado	14, 28, 87, 88, 89, 89a, 90, 91, 92, 93, 94, 94a, 119, 120, 121, 122, 123, 124, 125, 126, 127, 128, 129, 130, 131, 132, 133, 134, 135, 136, 137, 138, 139, 140, 141, 142, 143, 144, 145, 146, 147, 148, 182, 183, 184, 242, 256, 269, 270, 271, 272, 273, 274, 290, 291, 292, 300,
52	Wexpro Company, Salt Lake City, Utah	177, 180, 203, 205, 222, 225, 226
53	American Wilderness Alliance, Englewood, Colorado	293
54	Tom Latham, De Beque, Colorado	155, 203
55	Jeanne Hemphill, Seattle, Washington	177, 189, 203, 205, 227, 228, 243, 244, 245, 248, 275
56	Sharyl Kinnear, Grand Junction, Colorado (Uncompahgre Group, Sierra Club)	8, 195, 229, 276, 294
57	Miles Keogh, Glade Park, Colorado (Mountain Island Ranch)	26, 29, 32, 33, 34, 35, 36, 70, 165, 176, 177, 180, 186, 190, 203, 204, 205, 208, 222, 230, 231, 232, 233, 234, 235, 236, 242, 243, 244, 245, 246, 248, 277, 278, 279
58	Board of County Commissioners, Delta County, Delta, Colorado	30
59	Mark Pearson, Grand Junction, Colorado (Colorado Open Space Council)	293
60	Powderhorn Coal Company, Palisade, Colorado	1, 2, 3, 4, 5, 9, 15, 16, 37, 91, 95, 96, 97, 98, 99, 100, 101, 102, 103, 111, 149, 157, 161, 183, 196, 237, 242, 256, 273, 280, 281, 282, 295, 296
61	David L. Furr, De Beque, Colorado	293
62	State of Colorado, Department of Natural Resources, Denver, Colorado	38, 39, 40, 41, 42, 43, 297
63	Otis C. Coles, Jr., El Paso, Texas	205
64	Beartooth Oil and Gas Company, Billings, Montana	202
65	Bill Hamann, Palisade, Colorado	283
66	Helen Hyde, Paonia, Colorado	162, 163, 197, 284, 304
67	Fessler Brothers et al, Grand Junction, Colorado	104, 105, 166, 167, 168, 169
68	Fessler Brothers, Grand Junction, Colorado	40, 43, 44, 45, 46, 47, 48, 49
69	ARCO Exploration Company, Denver, Colorado	38, 40, 42, 50
70	USDI, Office of Surface Mining, Reclamation and Enforcement, Denver, Colorado	6, 27, 38, 71, 75, 76, 77, 106, 111, 150, 151, 152, 153, 158, 198, 199, 256, 305
71	Gordon Engineering, Inc., Grand Junction, Colorado	285
72	D&G Roustabout Services	166, 170, 177, 187, 203, 205, 108, 232, 256
73	Connie Albrecht, Palisade, Colorado (Friends of the Earth)	
74	Charlie Talbott, Palisade, Colorado (Talbott Farms)	
75	Paul Peterson, Audubon Society of Western Colorado, Grand Junction, Colorado	

Table 2. Letter Commenters—Continued

Commenter Number[1]	Individual, Group, or Agency	Response Number[2]
76	Walter S. Fees, Jr., Grand Junction, Colorado	38, 39, 40, 49, 51, 52, 53
77	Carl Burley and Associates, Inc., Grand Junction, Colorado	54
78	Mid-America Pipeline Company, Tulsa, Oklahoma	40, 42, 53, 54, 55, 56, 301
79	Dr. X, Ambassador, Planet Zebulon	177
80	Micah Yates	
81	Rocky Mountain Natural Gas Company, Inc., Glenwood Springs, Colorado	40, 42, 43, 53, 54, 56, 57
82	Burkhalter Engineering, Inc., Grand Junction, Colorado	40, 47, 53, 54, 58, 59, 60, 61
83	Northwest Pipeline Corporation, Grand Junction, Colorado	40, 62, 73
84	Danni L. ngdon, Grand Junction, Colorado	74, 165, 166, 171, 172, 204, 238, 302
85	Dale B. Albertson, De Beque, Colorado	293, 298
86	Environmental Protection Agency, Region VIII, Denver, Colorado	7, 10, 11, 12, 17, 18, 19, 20, 107, 108, 109, 158, 239, 306, 307
87	Fuelco, Denver, Colorado	40, 42, 53, 61, 63, 64, 65, 66, 67, 68
88	Phillips Oil Company, Denver, Colorado	
89	Independent Petroleum Association of Mountain States, Denver, Colorado	
90	TXO Productions Corp., Denver, Colorado	
91	Northwest Pipeline Corp., Salt Lake City, Utah	39, 40, 54
92	Grand Junction Cycle Board, Grand Junction, Colorado	62, 73
		191

[1]The numbers identify the commenter. They appear in the upper right corner of the letters and in the Response section.
[2]These numbers are used to identify the response to a comment. They appear in the margins of the letters and also in the Response section.

TRANSCRIPTS AND LETTERS

Most of the testimony and all of the comment letters follow. The alphanumerics (A-1, A-2, etc.) and the numbers (1, 2, 3, etc.) appearing in the upper right corner of the transcripts and comment letters, respectively, are used to identify the commenter. These alphanumerics and numbers also appear in Tables 1 and 2 (column 1) and in the responses that follow this section. The numbers that appear in the margins are response numbers. The responses to comments are listed in the Response section by these numbers. Where a comment appears on more than one letter or in the testimony, only one response is given.

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REPORTER'S TRANSCRIPT

GRAND JUNCTION RESOURCE MANAGEMENT PLAN
(PUBLIC MEETING NUMBER 1)
May 13, 1985

BE IT REMEMBERED, that on this, the 13th day of May, 1985, at the Bureau of Land Management offices, 764 Horizon Drive, Grand Junction, Colorado, came on for hearing at 7:26 p. m., the foregoing public meeting before Mr. Lee Carle, Oil Shale Project Manager, and before Julie A. Ward, Registered Professional Reporter and Notary Public in and for the State of Colorado, whereupon the following proceedings were had:

ORIGINAL

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oral presentation from the audience. Please begin your oral statement by stating your name, address and the organization you represent, if any. Also, please use the microphone here at the front of the room.

Is a representative of the Governor who wishes to speak here tonight?

Are there any members of Congress or their staff who wish to speak?

Are there any members of the State legislature who wish to speak?

Any county officials?

The local government?

Any State agency?

Any federal agency?

Now, for the individual speakers. Our first speaker is Clifford Bailey. Mr. Bailey.

(7:50 p.m.)

MR. BAILEY: Thank you. My name is Clifford Bailey. I live in Palisade. Lived in Grand Junction for 16 years prior to moving to Ohio where we lived for 11 years.

I have been a rockhound for most of those years, if not all of them, and when we moved to Ohio, we had to go back there to settle an

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estate, and the State of Ohio wanted the property that we moved down to, which was an inheritance and, unfortunately, we weren't prepared to sell, and so they threatened us with eminent domain if we did not sell to them.

Now, I hope that this -- this plan, by the Bureau of Land Management -- actually, it seems like I am facing a bunch of Ralph Naders, but I trust that all sides will be taken into consideration in the designation of Black Ridge as a wilderness area, because it is very vital to those of us who live in this valley to be able to follow our hobbies, and those of us, who are older, who have this hobby, cannot walk the distances that would be involved if we were forbidden to travel on these roads that we can now negotiate with a Jeep or other four-wheel drive vehicle, and, I feel that -- well, we felt that we had moved back home, that is what we thought, where it would be freer. Because we felt that the State of Ohio hardly had the right to expropriate land that was ours by inheritance, unless they were putting a highway through.

Now, I can understand that there is certain areas, such as the Colorado National

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Monument, and places like in Arizona, like the Petrified Forest, and there are other areas around here, probably, that could be designated, in fact, the whole desert is a wilderness area, if you want to look at it that way, the word "wilderness", includes desert areas. And, seems to me that with designating more and more wilderness areas, that it is -- it is going to be, soon, nearly impossible for anybody to carry on a meaningful hobby in hunting rocks, petrified wood and agates and so forth, so, I -- it is my contention that we should think this matter over very closely because there are a lot of people besides even rockhounds that are interested in Black Ridge, and whose hobbies would be cut off or stopped entirely by the designation of this area as a wilderness area.

I think that is about all I will have to say, because, undoubtedly, there are others who would like to say something, too. Thank you.

(7:53 p.m.)

MR. CARLE: All right, sir. Thank you. Our next speaker is Ed Jones.

(7:53 p.m.)

MR. JONES: My name is Ed Jones, I live at 2995 Highway 50, in Grand Junction, and I

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want to speak on recreation, and it is too bad Governor Lamm wasn't here tonight, or some representative, because just in the last couple of days he has said that one of the biggest industries in the State of Colorado is recreation. I am sure some of you people have read his statement.

Now, we are also talking about turning Grand Junction into a retirement area. Now, when people come in here to live in a retirement area, and this is a beautiful retirement area, these people need room to move around. Now, particularly, I am interested in Black Ridge because it is close to town and I know that area. I have driven every trail on that area and I have flown that area and I know Black Ridge, and it is a good recreational area, only because of those trails being left open for the people to drive and get in there, and I can't see any reason why the State of Colorado can't have -- I am a rockhound, so I am going to speak partly as a rockhound -- a rockhounding area. Other states have designated areas set aside for rockhounding, but there is not one in the state of Colorado, and I would like to see one area set aside in this state for that

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purpose.

People come from Texas, a lot of people come from Texas because Texas is all privately-owned. They have no free government areas like we have out here, which is a real blessing to our part of the state, and I would like to -- to keep, particularly Black Ridge, because I know it, open as a recreational area. Thank you.

(7:55 p.m.)

MR. CARIE: Thank you, sir. Our next speaker will be R. D. Jacks.

MR. JACKS: Yes, sir. My name is R. D. Jacks, I live here in the Grand Junction area. My wife and I recently moved here for some of the points that the gentleman that preceded me brought out, a retirement area.

There are several things I enjoy doing, I am limited, physically, because of a couple of heart operations, as to what I can do. I enjoy rockhounding, I enjoy hunting. If some of these areas, as the Black Ridge area, is closed to vehicular traffic, that leaves me sitting at home looking at a boob-tube, which I do not enjoy. I enjoy fishing -- we have a collection, that I

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brought up tonight, of gemstone, some of it has been cut and polished, some of it has been thrashed. With permission of the Chairman, after the meeting I will lay this out on one of the tables where it can be inspected. These are the things that we gather during warm weather months that we can work on during winter when we can't get into this high country.

I can drive a vehicle up to a certain area, work away from the vehicle to a certain distance; our trash generated, if any, is brought home. We have been up in the mountains and we found trash that the hikers and the riders up there, the people that are using horses for transportation, they carry their items one way and they leave the garbage. It doesn't present a very pretty picture when you are going up through the mountains, to find a bunch of garbage that someone preceded you.

I, personally, if -- as I have said, if the roads are closed, that leaves the senior citizen out. I am not the only one that is limited, physically, there are over a hundred members of the gem -- local gem and mineral club that are in the same condition I am, and I think

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that this is one of the points that should be made in this, that there is enough recreational areas in the State of Colorado, and, in yesterday's local paper, there was quite an article by Governor Lamm, he gave a little speech at Montrose. The big thing in the State of Colorado that brings in the almighty green dollar is recreation. Fine. There are a lot of retired people that would move to the Grand Junction area if they could retire here and have something to do other than lay around in the sun or play cow-pasture pool, and I think this is the point that needs to be brought out in this. I thank you. That is about it.

(7:59 p.m.)

MR. CARIE: Thank you. Our next speaker is Miles Koog. [phon.]

MR. KEOGH: My name is Miles Key. [phon.]

MR. CARIE: Keogh.

MR. KEOGH: I live on Glade Park, I am the manager for Mountain Island Ranch. I have several comments to make, one of being to thank you for the opportunity to come before the BLM and review the resource management plan that has been

A5

prepared.

I have several lengthy comments which I will, at a later date, submit in writing. The ranch that I work for is -- has several holdings and also several grazing leases bordering the area on Glade Park in the Colorado River. Thank you for this opportunity.

(8:00 p.m.)

MR. CARIE: Our next speaker is Bill Prather.

MR. PRATHER: I am Bill Prather, a rancher from DeBeque. I am not going to tell you how long I have been there. I do thank you for holding this hearing and giving us an opportunity to express some comments.

I am sorry that I have not had time to completely analyze this whole document, I suspect it took probably a hundred people six months to prepare it, and they were experts, so forgive me if I don't completely understand quite all of it.

I sincerely wish that there had been more consultation with the ranchers who live in the area of the BLM lands and use them for grazing in connection with their ranching operations. I believe there would have been more consideration

A5

of, and hopefully less disregard, of the extensive adverse impact the proposals in this plan are going to have on these operations that contribute substantially to the local economies.

If some of the proposals were changed, especially this substantial increase in wildlife numbers are implemented, it will likely mean the demise of some of these ranching operations, and considerable reduction, empty operation and production from the others. 78

In spite of 20 or more itemized areas of impact, there is no consideration of the impacts on the land owner residents within the area of RMP lands, or the economic consideration for what the proposal will have on these ranching businesses, and those 20 were listed in this document. 154

I have been interested in range management for quite a long time. I went to CSU before the Second War. As recently as 1967, CSU -- or 1963, I am sorry -- prepared this booklet, Colorado Range Management Handbook. It showed that 60 percent of the income of Colorado was derived from agricultural, over 60 percent of that from livestock.

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Without grazing, livestock is not a functional enterprise in Colorado. You must graze the mother calves -- the mother cows to get the calves that they put in the feedlots and put in your grocery store, and I think we would make a terrible mistake if we overlook that. And in this area, grazing of the federal lands is critical. I will give you a few examples of why.

I -- first, I will remark in Chapter 5 on Page 227 there are quite a list of consultants.

MR. CARIE: Excuse me, Mr. Prather, let's see if we can't fix the microphone.

MR. PRATHER: What did I do, turn it off?

(Mr. Keeton adjusts microphone.)

MR. PRATHER: Is it working now?

MR. CARIE: Yes.

MR. PRATHER: All right. Chapter 5 on Page 227, there is quite a list of consultants. There were no rancher residents among them. As a few examples of why I am probably speaking against wildlife, let me give you an example or two: 155

Twenty years ago there were no geese, very few herons in this area. The Department of Wildlife expanded their wildlife and it had some

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benefits. In my case, they came to the land owners and wanted us to furnish habitat on our lands for the wildlife. Many of us did. I did.

They decided a couple three years ago they needed two acres of my land for the interstate highway, in reference to what the other gentleman said. The wildlife people came, and they confiscated 50 more acres of my land to replace the wildlife habitat on the two where they built the road, that were mine in the first place.

They did that in a manner, and with the same excuses quite similar to what Mr. Tojo said when he took the Phillipine Islands to get the resources for his industries; what Mr. Hitler said when he took France to get a warm-water port. Yes, and what Russia is doing today in Afghanistan to get what they need.

I -- it is frightening when you know that they can do this and you can't do anything about it. They told me that I just as well accept an offer of $356 an acre when their own studies showed there was $30,000 an acre of -- worth of gravel on the land, because they would make it cost me more than I could get if I didn't.

When I told them I wasn't very bright,

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and kind of stubborn, I was going to spend a little money, they laughed, says, "That is all right, we will keep it tied up in court longer than you will live, anyway." Well, so far they haven't done that, but they did Sis Mahaffey, my neighborhood. They kept appealing hers until she died without ever getting anything.

I am reciting this to alert you people to the dangers of the Wildlife Department and their personnel wherein they are going to increase the wildlife throughout every one of these proposals. And when they do, they are going to destroy much of the rest of us.

78 On Page 153, they are going to increase the deer and elk 24 percent by 1990. Twenty years ago I had 150 deer on my land and they weren't too bad, now, I have between 750, 1,000 eating my fields every spring and every fall; that is bad. I used to raise alfalfa seed and sell it, it was a good income. The deer loved these pods. They got to the point where they was never a pod get ripe.

They eat my hay, they say -- oh, yes, they tell all you people they are going to pay me. Let me tell you how they want about it.

First, they built some little cages

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one-one hundreth of an acre, with a lot of publicity. They set them in my fields, but I noticed that within the cage the hay wasn't growing any more than it was outside, and I couldn't understand it until I used the old farmer line-up and I lined up the little cages. So help me, every few days when the game warden came to check it, the cage got moved, ever so little, in the field.

Now, that is the kind of people you are dealing with. And I think you want to bear in mind when you see them taking such a large part in this plan, what they are up to. I can't raise alfalfa hay anymore. We used to plant alfalfa hay, it would be good for from seven to ten years. Now, there are so many deer that in the spring when the little plants start its shoots, they bite them off. So many times the juice runs out, it loses the nutrient it stored last year to start this year, until when it does finally get -- they finally move out and it starts, there is only four, five or maybe seven stems of hay come up. They are weak to start with, they don't grow much, so, therefore, they don't replenish the nourishment to start the next time. It dies.

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79 There is a proposal to increase the fish habitat. I just wonder at whose expense? Most of the waters in these plans are on private land. Does that mean I can't irrigate anymore? They have been proposals to put -- stop us from taking the water out of the stream to irrigate. Don't let the waste water run back if it changes the temperature more than five degrees where it enters. My waste water is another man's water right.

MR. CARIE: Mr. Prather, you have one minute left.

MR. PRATHER: I was afraid of that. No one ever has time to hear all these reasons. It is kind of regrettable.

MR. CARIE: There will be time after the formal hearing.

MR. PRATHER: The proposal to save the prairie dogs in my area. Well, believe me, they have got so many prairie dogs on my land out there, they can't get enough to make a living. They all come and dig holes in my field. I don't want any more prairie dogs. They state on page 80 189 they are going to lose 185 A.U.E.'s of deer and elk, but they are going to make it up. I just

A6

80 wonder where and at whose expense. When we set up the Wild Horse Area up here, it is well-documented 159 there would never be more than 50 wild horses. Now, it is 120. There won't be room for them, so where will they go next?

MR. CARIE: Your ten minutes are up, Mr. Prather.

MR. PRATHER: Thank you.

(8:10 p.m.)

MR. CARIE: John Musser.

MR. MUSSER: Give me your notes, I'll finish for you, Bill.

MR. CARIE: Excuse me, are there any questions of the panel of the presentation? No? A reminder that there will be time following the presentations by each of you, for finishing any testimony that was unfinished, such as Mr. Prather had. Sir.

MR. MUSSER: All right. My name is John Musser, I represent Musser Brothers and Musser Ranches from Delta-Escalante-Dominguez Area. I would sure like to thank Bill Prather for everything he had to say here. Wish you would have given him a little more time.

I think one thing that you have

drastically overlooked in all this study, he mentioned it, agricultural is the number one industry in this state, has been always, and will continue to be. I think you ought to look toward agriculture a little bit, rather than -- rather than away from us.

I would like to comment, specifically, on the Domingues Wilderness Proposal. I do have written comments so I won't take up a lot of time, but Jim Keaton mentioned that one of the criteria for wilderness was a roadless area. Well, we -- we have the grazing rights on a good bit of that land that is set aside for the Domingues Wilderness study area and we felt that it was a primitive wilderness area until it was advertised as a wilderness study area. And, while you people don't call those roads, there are roads, have shown up all over our allotment since it has been advertised as a study area. You can't police it now, I don't know how you intend to police it after you turn it into a wilderness area.

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One thing that Bill didn't address that kind of surprised me was all the problems that we, as ranchers, have with recreationists in matters of disregard to our private land. We own an awful

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lot of the private land that borders that proposed wilderness area. As a matter of fact, we own most of the access to that wilderness area. I don't -- I don't understand just exactly how you people plan to get your people, your recreationists into a wilderness area that you don't own access to.

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I don't want to take up a lot more of your time, I do have some written comments that I will turn in. Thank you very much.

(8:13 p.m.)

MR. CARIE: Thank you, sir. Russell D. Webber.

MR. WEBBER: Weber. [phon.]

MR. CARIE: Webber. [phon.]

MR. WEBBER: I am Russell Webber, I am a resident of the Grand Junction area, I am here on behalf of the Orchard Mesa Gun Club. Some seven years ago we entered into a lease agreement with the BLM and Mesa County Commissioners to lease a parcel of land for a shooting range in the Book Cliff area. This is in an area designated in your book as an extensive off-road vehicle and a no-shooting area.

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We would like to ask if any of these plans are developed, that the extensive off-road

use and the no-shooting area be changed so it does not infringe on use of the range we are developing. I think that is all I have. Thank you.

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(8:14 p.m.)

MR. CARIE: Thank you, sir. Does the panel have any questions of the speaker?

MR. KEETON: No.

MR. CARIE: Gerry Stuart.

MS. STUART: I am Gerry Stuart, Grand Junction, Colorado. I don't represent the Grand Junction Gem & Mineral Club, but I am a member of that club and as one of those rockhounds, most of us are senior citizens. We have -- we rockhounds, as a group, have discovered some of the greatest fossils in the world, and just one of the examples is the dinosaur find on Dry Mesa. That is in Mesa County. It may be close to Montrose, but it is in Mesa County, and that is -- is a fantastic find. There are many other finds here in the area, and it would really be a sad thing if those of us who are interested in finding the various fossil remains and the various rock specimen, which are of great importance to have in our museums -- both here and

other places, like to keep most of them here, of course -- are important, and I am afraid that most of the people who would be backpackers and such, would not be interested in keeping those things.

We always try, as a group, to leave an area at least as clean as we found it. And, of course, we are all looking for that great find, our very own complete dinosaur that we can keep right here in River City, and, yet, here we are within the danger of not being able to get to that. One of the most likely places to search in the area, the entire area.

So, I think it would be a great help to many of us, I think you are overlooking the number of rock hunters who do go to that area. You don't see much of us because we know exactly where we are going, we know how to get there, we don't have to ask for the maps, and we don't tear it up. Thank you.

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(8:17 p.m.)

MR. CARIE: Thank you, ma'am. Does the panel have a question?

MR. KEETON: Yes, I have a question. Gerry, which area, in particular, were you talking about?

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MS. STUART: Black Ridge.

MR. KESTON: Black Ridge.

MS. STUART: Yes.

MR. KESTON: Okay. Thank you.

MR. CARIE: Ralph Stuart.

(8:17 p.m.)

MR. STUART: I represent myself, and I am also a member of the Grand Junction Gem & Mineral Club.

My wife, who just spoke, we have lived here for -- since 1961, and we like the wilderness and the outdoors as well as the next person, but there are areas that -- such as Black Ridge, that are accessible, from a practical standpoint, by truck or vehicle. It is true that a person can hike into a area, they can ride a horse back into that area, but not everyone can do that. As been -- as has been mentioned previously, many of the people involved in -- in rockhounding, which is a legitimate hobby in the United States, are in the senior citizen group and they are not able to walk the distance it would be necessary. Those who have been in the Black Ridge area know that it is a long trail back in there and it is seven to ten miles to some of the areas.

A9

The times that we have been there, we have driven our vehicle, stayed on the trail, which I notice in your manual which is not listed as a road, but as a trail. We have stayed on the road, then. Most of the searching that is done is on foot in the half mile to a mile raidus of the parked vehicle. So, as far as damage to the environment or to the wilderness terrain, there is very little. The materials that are picked up that have been alluded to, as dinosaur bone, agatized dinosaur bone, agatized wood and so forth, is described as fluted; it is a material that is left from the weathering process that goes on, and it is all surface, it is not mined. The terrain is not disturbed, particularly, by picking up these bits of rock. Obviously, not a lot can be carried back.

175 Hunting is also another hobby of mine. I have hunted in the -- in years past up on Black Ridge, and it is a good place to go hunting and a lot of other people hunt up there. I don't know how a wilderness designation would affect that. It probably would affect it adversely as far as out-of-state hunters are concerned. I think, in summary, if at all possible, you could leave the

A10

175 designation of that area, or management of that area in that -- one of your alternatives, I think it is on Page 81, in which access is limited to the existing trails.

I think one other thing regarding Black Ridge, in defense to the ranchers in the area, I are who are familiar with that area know that the trail does not cross private property even though there are some trails that could be crossed. Thank you.

(8:20 p.m.)

MR. CARIE: You bet. Thank you. Henry Barbe.

MR. BARBE: I am Henry Barbe, I represent Powderhorn Coal Company, P. O. Box 1430, Palisade, Colorado.

Basically, we approve of the Preferred Alternative, we just have several comments that we would like to bring out at this time.

21 On page 97, the second paragraph in the second column, relates to the unleased portion of the Palisade municipal watershed and the Colorado River corridor being identified as unsuitable based on coal unsuitability criteria. This is not shown on Map Number 5 on the Preferred

A10

21 Alternative, and we just would like to get that corrected.

There is another statement just underneath that that says that the coal unsuitability criteria would not apply to existing coal leases, the existing coal leases covering 4,000 acres in the Palisade municipal watershed

22 would be allowed to develop. We have a letter from the district Area Manager here of August 25th, 1982, from Larry McBurda that refers to those leases being identified as not being unsuitable for leasing for those 4,000 acres.

Going on through the continuation of

23 the Current Management Plan on Page 147, there is a reference to significant subsidence with surface expression. We need a definition of significant subsidence. We don't know exactly what that is. One of the mitigation measures on 147-148 is, "By not mining directly underneath streams, reservoirs or by prohibiting coal mining within established buffer zones along streams and reservoirs, or by prohibiting coal mining within established buffer zones along streams and reservoirs, impacts to the watershed would be lessened. Any site-specific impacts of developing this lease would be

addressed when a mine plan was submitted."

We submitted a mine plan in 1981 with subsequent revisions in 1982, '83, '84 and '85 with the Mine Permit application being approved by the Office of Surface mining and the Colorado Mine Land Reclamation Board and the BLM, with their concurrence of January 3rd, 1983.

In Chapter 4, under "Environmental Consequences," there is a reference to identifying the 14,100 acres of federal coal as unsuitable for further coal leasing and that would eliminate an estimated 185.5 million short tons of impacted coal leases from leasing it. Goes on to say by doing that, by eliminating that from further leasing, the impact would be low as coal companies would have difficulty removing coal beneath the Colorado River.

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10,000 acres is 15 -- on average 15 square miles, 15.6, I believe. That is considered to be a -- a low impact with no consideration for economics or the loss of retrievable resources.

Just a quick rundown of what that means in money. At the current rates, this is considering a 50 percent recovery factor, the 75 percent prep-plant yield, provided it had a wash

plant and the $25 per ton selling price, and using an 8 percent royalty, that amounts to $139,125,000.

Then, on Page 151, going to the Continuation of Current Management Impacts, it relates to the -- it refers to 15,360,000 tons which would be a high impact, that might result in the area being uneconomical to mine. We are a little confused by that.

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On Page 201 on the Preferred Alternative Impacts, the Impacts Coal Management, in particular, there is no reference to SMCRA, which is the Surface Mining Control and Reclamation Act of 1977. There is a statement in that the result of significance subsidence could result in the loss of some or all perennial stream flow in the municipal watershed and the Colorado River by leakage into the mining zone.

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There must be a time element involved in that, if that were really to occur, because we know that the water just doesn't disappear, it has got to come back up sometime. It says, "Development of an existing coal lease in the lower portion of the Palisade municipal watershed identified as unsuitable would not have a

significant effect on Palisade's water supply." We agree with that statement with one exception, that it isn't identified as unsuitable or we wouldn't have been able to have gotten the current mine plan approved by O.S.M, the BLM and the Mine Land Reclamation.

25

And again, on 202, it refers to "Any site-specific impacts of developing this lease would be addressed when a mine plan was submitted." We just want to let you know that we did submit a mine plan and it has been approved.

That is all I have, I appreciate the opportunity and ability to comment on the resource plan, and again, we recognize the fact that there has been a lot of effort put into it and that we concur with your approval of the Preferred Alternative. Thank you.

(8:27 p.m.)

MR. CARIE: Thank you. Are there any questions of the testimony?

MR. KEETON: Henry?

MR. BARBE: Yes, sir.

MR. KEETON: Go ahead.

MR. LITTRELL: When you are talking about the Palisade watershed that your mine plan

was approved, wouldn't be unsuitable, you are talking about your existing leases?

MR. BARBE: That's correct.

MR. LITTRELL: And not the unleased portion?

MR. BARBE: That is correct, also. Any more questions?

MR. KEETON: Yes, I have got one.

MR. BARBE: Go ahead.

MR. KEETON: You stated that you had a letter from McBurda dated August 2nd, 1982?

MR. BARBE: August 25th, 1982.

MR. KEETON: 25th. Okay. Could you go over what that letter said, again? I didn't --

MR. BARBE: Sure. What that has to do with was the concurrence with O.S.M. and Mine Land Reclamation and the U.S.G.S. and Minerals Management Service with regards to approval of an area and that it was not considered unsuitable. Let me read a portion of it to you.

It says, "We have reviewed the roadside in Cameo Number 1 mining plan in accordance with the memorandum between BLM, U.S.G.S., Minerals Managements Service," -- in parentheses, "And

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O.S.M. The plan is technically adequate for post-mining land use proposals and consistency with stipulations required by the lease. The unsuitability dry terrain have been applied to the leases and no part of the 7,491 acre tract is unsuitable for underground coal mining operations."

MR. KEETON: Again that was your -- what is presently, again, your existing lease?

MR. BARBE: That's correct.

MR. KEETON: Okay. Thank you.

MR. CARIE: Thank you, Mr. Barbe. Ted Hatzenbunler.

(8:29 p.m.)

MR. HATZENBUNLER: My name is Ted Hatzenbunler, I reside in Fruita and the area I would like to talk about is the area in Douglas Pass and this side of it. Last year we pulled a permit for that area to get in, and we drove all the way up to the DeBeque Canyon to get in, the same property which this man was complaining about the animals being on it, in the area. We could not get up there. We drove over a hundred miles trying to find access into it, asking farmers for access into the property and all we could get was

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a big "no".

Now, this is our property in there just as much as it is these ranchers' property. They complain about the animals on there, yet they don't allow us on their property to get to them. I don't think it is quite fair for the hunter to take all the razzing for the property when the ranchers won't even allow us onto it. We pay money for their game damages, we pay money for this and this, we don't get no results from it. We don't get to use their property, we don't get nothing on it at all.

I don't have much else to say about it, but I think something ought to be done about the access. Thank you.

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(8:30 p.m.)

MR. CARIE: Thank you, sir. Questions? Thank you. Glen Miller.

MR. MILLER: My name is Glenn Miller, I live at 2264 Willow Wood Road in Grand Junction.

In the Preferred Alternative, the maps show a series of areas, "Cd", for disposal, and the one particular area or group of areas I was concerned with was the river frontage in the

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valley, the precious little of it that is public river frontage. I think it would be a shame if the small areas out near Fruita were disposed of. I would like to see them added to instead of disposed of. The Walker Wildlife Refuge and the connected lakes area are, to my knowledge, the only other public river frontage in the valley, and the river is -- seems to me, is one of the major recreation attractions in the valley, and there is very little access to the river and very little river frontage. Thank you.

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(8:31 p.m.)

MR. CARIE: Questions? Thank you, Mr. Miller. Mark Pearson.

MR. PEARSON: My name is Mark Pearson, I live at 2448-I Road, Grand Junction. I am speaking tonight as a representative of the Colorado Open Space Council, which is Colorado's statewide coalition of conservation groups. I am also speaking as one of the authors of the "Citizens' Alternative" that was presented to BLM in February of 1984.

I would like to express my appreciation to BLM for the careful consideration that they gave to the "Citizens' Alternative". I think the

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BLM office here in Grand Junction is to be commended for the attention that they have shown for public input as compared to a lot of the other BLM plans we have seen around the state, and I think, as a result, the Grand Junction RMP is perhaps the best one yet produced in Colorado in terms of its content and its readability and its completeness.

I had a couple of comments about some aspects of our "Citizens' Alternative" and how it was incorporated into the Protection and Preferred Alternatives in the RMP. A major omission from the RMP is the lack of consideration of the lower Gunnison River from Delta to Grand Junction as a potential Wild and Scenic River candidate. We brought that up two years ago for the first time in the scoping section and have been at loggerheads with you ever since. Wilderness is considered as a multiple resource during evaluation of these RMP's, and we think Wild and Scenic River candidates should receive similar treatment in the RMP.

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Another omission in the RMP, which was something that we proposed in our "Citizens' Alternative", concerned the private land around

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the Unaweep Seep. Since the seep is important enough to have been designated as a Research Natural Area, and seeing as how most of the seep is not in public ownership at present, the RMP should identify the privately owned portion of the seep as a potential future acquisition. I am concerned that if this private land were, in the future, to become available for acquisition, either by the present owner wanting to sell it or willing to exchange it with BLM, BLM would not feel bound to pursue acquisition of it because you would not have identified it as one of the parcels deemed desirable for acquisition in the RMP, so I am wondering how you would be able to handle the seep if it became available for acquisition by the BLM, but it is not in your acquisition as something you would like to acquire.

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With respect for the wilderness recommendations of the RMP, I think the BLM has done an admirable job of drawing boundaries for the Black Ridge WSAs. Black Ridge is the premier wilderness candidate in the entire state of Colorado, and coming up with an intact unit that protects the integrity of all the wilderness values out there is extremely important. We also

A13

support the wilderness recommendation for Sewemup Mesa. The wilderness recommendation of Dominguez Canyon is good to an extent. We are glad to see that the two cherry stemmed ways from the top and to the bottom are both slated for inclusion in your wilderness boundaries but were a little puzzled about the reasoning for dropping 20,000 acres along the Gunnison and along Escalante Creek. It wasn't clear in the RMP if trespass is presently occurring in those areas, and I think that needs to be further explained.

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I don't see how the wilderness boundary is located is going to have much impact on potential trespass problems if trespass is occurring now there. It seems like it will continue to occur, regardless of any designation put on the land, such as wilderness. People are going there because it is public land, not because it is called something else.

I would also like to comment, specifically, on the Little Book Cliffs wilderness recommendation, or lack of wilderness recommendation. I am really disappointed by the non-wilderness recommendation for Little Book Cliffs, and it seems that BLM is continuing to

A13

pursue a policy in the entire Book Cliffs that is simply a continuation of their past mistakes. It seems like BLM is saying we made a big mess in the Book Cliffs in the past, so let's continue that approach indefinitely by continuing to lease all of the Book Cliffs for mineral development without trying to preserve any of it in its roadless condition.

I am disappointed the BLM has not attempted to rectify some of these past poor management decisions in the Book Cliffs through corrective measures in this RMP. For example, rather than simply saying, "Coal Canyon is already leased for coal, so let's lease everything else in that vicinity also", BLM should say, "Let's pursue exchange options for existing coal leases in Coal Canyon using our authority under the coal regulations." That wasn't considered in any of the alternatives in the RMP. Regarding oil and gas conflict in Little Book Cliffs, BLM should emphasize that the wells on the southern end of the Book Cliffs are marginal wells that consist largely of abandoned semi-dry holes. As such, the mineral resource that would be foregone by designating Little Book Cliffs as wilderness would

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be minimal. BLM should mention the unit agreement in the RMP, and along with a discussion for the potential for unit contraction and eventual expiration of those leases in the WSA.

The RMP could recommend no future leasing for portions of the WSA when those existing leases expired, rather than renewing an unfortunate cycle of leasing in this area, which has remarkable non-mineral values, which include wildlife and recreation.

204

One good aspect of the management of Little Book Cliffs in the RMP is closure of Main Canyon and it tributaries to ORV's.

We would like to support the identification and management of semi-primitive, non-motorized recreation areas in Granite Creek, Hunter Canyon, and Banga/Rough Canyons is strongly encouraged.

(Court Reporter stops speaker and instructs him to speak slowly.)

MR. PEARSON: Well, getting back to the semi-primitive, non-motorized recreation areas, we are glad to see those in there because they will provide an alternative to the recommended wilderness areas and will be a useful

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tool in diverting recreational pressure away from wilderness.

The discrepancy between management or in the management of the lower Colorado and lower Dolores Rivers is disturbing. Both rivers, the Colorado through Ruby and Horse Thief Canyons, and the Dolores below Gateway, were recommended as scenic rivers in the same study that was done by, I guess, the National Parks Service. And since 177 both rivers had received the same recommendation in the same study, it would seem that they should be managed the same way in the RMP, but that is not what is being proposed. The lower Colorado is being withdrawn from mineral entry, the lower Dolores is not, and I -- we would like to see the lower Dolores River below Gateway withdrawn from mineral development in the same way that the lower Colorado is being withdrawn.

Then, lastly, a number of the tracts that are identified by the disposal in the plan concern us greatly. None of the publicly-owned 243 land in Unaweep Canyon should be disposed of by selling it. If the Forest Service is not interested in managing the BLM lands in Unaweep Canyon, BLM should retain ownership. Unaweep

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Canyon is an irreplaceable scenic asset. As such, no management actions should be taken by BLM that 243 could degrade this asset, such as turning the property over to private ownership.

Similarly, the tracts along the edges of Sinbad Valley, which include parts of Sinbad 244 Ridge, should not be sold either. As with Unaweep Canyon, if the Forest Service has no interest in managing those lands, BLM should retain ownership.

Thanks, and here is a copy of my written comments.

(8:40 p.m.)

MR. CARIE: Question from the panel? Thank you, Mr. Pearson. Sharyl Kinnear.

(8:41 p.m.)

MS. KINNEAR: My name is Sharyl Kinnear, I live here in Grand Junction, and tonight I am speaking on behalf of the Uncompahgre Group of the Sierra Club. Currently, we have over 100 members and our boundaries include Grand Junction, Delta and Montrose.

Most of our members, from what I have gathered during our meeting times, have enjoyed recreational opportunities on the BLM lands that are discussed in this plan. That includes hiking,

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bird watching, backpacking, rafting and kayaking.

The group, itself, leads outings into several BLM WSAs and roadless areas, and, also, the State Chapter of the Sierra Club leads outings into several of these areas. Some of our members are even employed as guides and outfitters and utilize these lands and rivers under the jurisdiction of this BLM office. Also, some of our members participate on the "Citizens' Alternative" formation that Mark Pearson just spoke of.

Overall, we feel that the plan looks very good. About a year ago, some of the BLM personnel were concerned, or they expressed their concern to us that they may not have a very large budget for this plan, and they were concerned about the quality of the plan and the maps. Well, we feel you have done just a great job. The maps look good, the document is very readable. I think that has something to say about the personnel and the editor. The editor never gets any credit.

I also agree with Mark Pearson that this is the best resource management plan that we have seen in the State of Colorado, and I think I would echo Mark's opinion that is because you have

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listened to the public so much. Naturally, not everyone can be 100 percent satisfied with a plan of this magnitude and we also have some concerns.

The first topic I would like to discuss is wilderness, The Uncompahgre group of the Sierra Club would like to see all seven WSAs recommended as wilderness. Well-justified in making this request because each wilderness study area is unique and represents a significant addition to the National Wilderness Preservation System as the plan says, itself. These areas consist of lower elevation canyons and mesas of the Colorado Plateau and are not, as yet, represented in this National Wilderness Preservation System.

Also, some of these areas contain Slickrock Canyon, and these types of areas are increasing in popularity for recreation. One reason is that they are accessible for a greater portion of the year than some of your higher elevation wilderness areas. Also, wilderness use is growing at a rate which will overburden wilderness availability in less than 15 years. Our concern is that wilderness is not a resource that you can throw out the window today and 15 years down the road, when you decide that maybe

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you need more wilderness to meet the demand, you can throw it back in. During the time it has been thrown out, the wilderness qualities will have been destroyed, so it is our hope that the BLM will consider reconsidering their position and recommended all seven WSAs as wilderness.

On a case-by-case basis, we commend the BLM on its boundaries of Black Ridge. We like the idea of combining Black Ridge Canyon and Black Ridge Canyon West into one cohesive area.

203 However, we are disappointed in the boundaries for Domingues Canyons. We are concerned about the 19,000 acres that were excluded from the south and eastern boundaries. I wasn't sure as to why this area was excluded. If it is because of trespass violations, I feel that trespass and public land use -- I don't know if trespassing occurs, but I know public land use does occur, and will continue to occur, no matter what, so we would like to see those boundaries adjusted.

We also congratulate the BLM for its pro-wilderness recommendation for Sewemup Mesa. The Uncompahgre group led an outing to the spectacular wilderness study area two weekends ago. It is a stupendous mesa with wonderful

A 14

vistas. As we were exploring some of the ranges, we discovered mountain lions' tracks. We also saw Peregrine falcons and red-tailed hawk.

As far as the Palisade WSA is concerned, it was much to our chagrin that the BLM did not recommend this area as wilderness. We led an outing to this area, also, three weekends ago. Unaweep Seep is a Research Natural Area that many people are familiar with. We like, in the plan, this recommendation has continued.

On Page 385 of the plan, it states that the reasons the Palisade was not recommended as wilderness are as such: Configuration, steep slopes, and potential trespass problems prevented the unit from being recommened for wilderness in this alternative. The Uncompahgre group feels 205 that some boundary adjustment could be made to take care of configuration and potential trespass problems. As far as steep slopes are concerned, I have no idea why that would prevent a unit from becoming or being recommended as wilderness, and, perhaps, after the hearing, someone in the BLM can brief me on that, or maybe in the final plan that can be addressed.

We are also concerned about the

A 14

non-wilderness recommendations for Little Book Cliffs and Demaree Canyon wilderness study areas. It exhibits rugged terrain, which is excellent habitat for mountain lions and bobcats. Bald and mountain eagles are present, as well as hawks, ravens, and turkey vultures and winter range for deer and elk.

As you descend into the canyons of the area, stratified layers of the Mesa Verde geological formation where fossils of dinosaur bones may be eroding out are found. If the oil 206 and gas resources there are so important, we feel that methods such as slant drilling could be utilized, or helicopter access, and you could still maintain the integrity of the area's wilderness.

As far as Little Book Cliffs is concerned, it is the only forested Wild Horse Range in the United States, and it is my understanding that there are -- this is one of three wild horse ranges nationwide. The area's uniqueness as a pristine remnant of the Book Cliffs region outweighs the development 204 opportunities. BLM should strike a balance between wilderness and mineral resources by

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204 setting aside this small fraction of the Book Cliffs region for its ecological values.

On the topic of rivers, we like the idea that you are going to ask for permits -- excuse me -- in Ruby and Horse Thief Canyons for environmental protection of the habitat, both, permits for commercial and non-commercial use.

We are glad to see the scenic management criteria will be used to manage the Colorado River through that area. We would also like to see a Wild and Scenic River study of the 176 Gunnison River of the section from the wildlife refuge near Delta, down to the Roller Dam near Grand Junction. We would like to see a provision in the final resource management plan if this study will be performed.

Concerning recreation, it was nice to see all the suggestions in the plan for the different designations, IRA, ONAs, IRNAs, things 164 like that. Our only concern would be that some of the designations for recration areas might impact on the cultural resources found in those areas.

Again, overall, we were very pleased with the plan and we do appreciate being able to speak out tonight, and thank you very much for

A 15

taking these comments into consideration.

(8:49 p.m.)

MR. CARIE: Questions? Thank you. Sue Kupelian.

MS. KUPELIAN: Can people -- whoops, I guess they can. They can hear me, can't they? I represent the Grand Junction -- first of all, name. Sue Kupelian, address 556 33 Road, and what other information did you want from me before I --

MR. CARIE: That would be fine. If you could, in your testimony, be a little slower than some of these people.

MR. KEETON: Who are you representing?

MS. KUPELIAN: I am representing the Grand Junction Cycle Board, WSRA, and also Grand Junction Area Off-Road Coalition.

The Cycle Board presently has 240 members, and we are growing at an average of approximately 10 members per month. I am addressing the area of the desert north of town, and from the Utah state line to 32 Road.

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We are concerned that access to areas traditionally used for off-road competition will

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be limited, restricted, or all together closed off. We are concerned that proposed permitting

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procedures would be prohibitively expensive to recreational riders.

The report, itself, states that 60 percent of off-road vehicle users presently ride outside the designated ORV area in the preferred proposal. A recent study has shown that 60,000 ORVs exist in Mesa County, excluding pickup trucks, four-wheel drives. This is nearly one ORV per capita. This is not a negligible majority of the population of our area.

We appreciate nature and realize the need to preserve our environment. We do not believe, however, that the recreational needs and rights of a large portion of the inhabitants of our valley must be denied or abridged in order to achieve this goal. We, therefore, request adoption of the Commodities Alternatives proposal

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for land management with the following provision:

We strongly oppose expensive and involved permitting procedures that all four proposals appear to require. We would not find

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the other three proposals acceptable. I would also like to note that with our sport rapidly

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growing in the Grand Junction area, damage to the environment would be more acute if all ORVs were

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required to use the same small area designated in the preferred proposal than if the ORVs were allowed to spread themselves out over a much larger area from the state line to 32 Road. Thank you.

(8:52 p.m.)

MR. CARIE: Questions? Thank you. R. M. Rose.

MR. ROSE: I am here, but I didn't have nothing to say. I don't know how you got that.

MR. CARIE: Is there another R. M. Rose in the audience?

MR. ROSE: Hope not.

MR. CARIE: Was there anyone that didn't finish their testimony that would like to continue? We have another speaker? Okay. John Thomas.

(8:53 p.m.)

MR. THOMAS: My name is John Thomas, I live in the Grand Junction area, and I am here tonight mainly to comment on the wilderness study areas as proposed by the BLM.

A 16

Overall, I too, am pleased with the wilderness study areas as proposed, and I want to support the boundaries as outlined for the Black Ridge area, including the protection for the lower Colorado.

With the idea of the lower Colorado in mind, I want to make a comment about the similar protection for the Dolores River. I am a frequent user of the Dolores River, floating raft trips, and sort of just as a private individual. I know that the Dolores was --

MR. KEETON: Could you slow down a little bit?

MR. THOMAS: Sure. I know that the Dolores was recommended for scenic status, along with the portion of the Colorado in your Resource Area. But, I see in reviewing the management

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resource plan, that the Dolores River was not accorded the same protection status as the lower Colorado. I want to urge that it receive that status, be -- be studied and recommended for scenic status and be protected and withdrawn from mineral use.

Other comments on the WSAs, the one that concerns me the most is recommendation in the Palisade area. In reviewing your analysis for

A16

suitable as wilderness, and for your resource impact alternatives, it is apparent to me that the highest and best usage of this area is wilderness. It meets all the criteria set forth by Congress, it has exceptional wilderness opportunities, it has exceptional opportunities for isolation, it is an outstanding natural state and is ecologically very diverse. According to your own impact statements, it has low potential for oil and gas, low potential for locatability of minerals, out of the 26,000 acres, it only has 800 acres that are apparently useable timber resource. Very small area.

It does see some ORV use, but there are -- there are many areas in that -- that geographical area where ORV use, off-road vehicle use is appropriate and available and very few areas in that geographical area where wilderness is available. This happens to be one of the very outstanding ones. 205

Your analysis gives me, really, no clue as to why this area was excluded from wilderness designation, and I want to urge that you reconsider that and include the Palisade for wilderness designation.

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Also, one other source of confusion for me, as I read the statement, concerns the Dominguez Canyon area, and that has to do with the depletion of the 19,000 acres or so, along the river area. Apparently -- apparently the issue is trespass, or some conflict with private land, as 203 stated in the resource analysis, but this is unclear to me, and I don't know why this had been deleted. As far as I am concerned, it should be included as wilderness designation, or any type of land designation on the area has no bearing, really, on the problems of trespass, it won't affect that.

I guess that is about all I had to say tonight. Thank you.

(8:56 p.m.)

MR. CARIE: Okay. Questions? Thank you, Mr. Thomas. Are there -- we have two more? Okay. Would you bring them forward, please. Thank you. M. R. Goodner.

(8:57 p.m.)

MR. GOODNER: I am Harlan Goodner, I reside at 1736 North 18th Street. Pardon my Texas accent but it took me 30 years to learn to speak Texan and I have only lived in Colorado 21

A17

years. I probably won't be talking too fast for you, ma'am.

I have lived in Grand Junction for 21 years, some of the students in Grand Junction High School think that I have been here since Grand Mesa was an ant hill. I see this problem from a lot of different sides.

I moved here out of the metropolitan Dallas-Ft. Worth area, which is one gigantic ant hill of people, because I thought Grand Junction was a better place to raise a couple of kids. Well, number two child, small son -- only bigger than I am -- graduated from college Saturday over at CSU, so I am through raising kids in Grand Junction.

I am a high-mileage model. I have worn out two motorcycles, a Jeep, a land rover and two pickups living in Grand Junction. I have knocked holes in a bunch of rubber rafts and kayaks. I have worn out a few pair of hiking boots. I enjoy the outdoors. I hunt, I fish, I own some bird books and binoculars, though I will admit there are some of the birds I would rather look at over the beat on a piggyback twelve gauge.

I am a conservationist. I am not a

A17

preservationist. I believe in wise use of our natural resources, and, gentlemen, there is no way that your recommendation or Congress' eventual decision is going to make everybody happy.

I hear the pleas of a number of elderly people, which I am rapidly becoming one of, that tell me that if you designate an area a wilderness area, you are reserving it for the young and healthy, or the very wealthy that can hire a guide and packer to take them in there on horseback, or whatever.

I see the bumper stickers that tell me that, "When you are freezing in the dark, eat an environmentalist". Now, I am not a buffalo hunter, but we had a choice whether we were going to raise grain and domestic cattle, or buffalo on the great plains. I come from a family of ranchers, and I have -- my wife's folks are still trying to afford to ranch. We starved out at it, went into construction work and then I decided there was something better than that, so I ended up becoming a shop teacher. There is no way that you are going to please all the pressure groups that you are faced with, and at the risk of irritating folks from Open Space and Sierra Club

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and so forth, get your wilderness areas back cut in the boonies where they are hard to get to, and areas like Black Ridge up here, leave those open access to people, where you are near a high-population density area here. I think those are sound principles.

You know, we have a lot of wilderness areas in the United States that are about as useful as mammary glands on a large male swine, other than providing a genetic pool for wildlife. They are not that much visited by that many people because they sit on the far side of nowhere and they are hard to get to. I have been to some of them, and I backpacked in them, but don't set an area aside as a wilderness area that is adjacent to a large population center, and, hey, North Avenue and 12th Street down here is the busiest street corner between Denver and Salt Lake. Thank you.

(9:01 p.m.)

(Applause from audience.)

MR. CARIE: Questions? John Ballagh.

MR. BALLAGH: Good evening. My name is John Ballagh, I reside at 554 East Moore

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Drive in Grand Junction, and I would like to address a couple of things. One, I am not a rockhound, but I do know that the Black Ridge area is known throughout the United States for some of its rock specimens, and while access is important to all these people, I think that relative scarcity is something that none of them have touched upon, and I would like to call it to your attention that you might carry on further conversation with these people about the importance of that site as far as a rock collecting area to people outside the Grand Junction area.

Particularly, in my case, I would like to address something that Mr. Miller talked about and that is disposal of properties by the Bureau or the public domain along the river. I think it is appropriate if you happen to pick up tonight's Sentinel that they compared the public cost involved with helping people that have been flooded along the river versus limitation of what goes on in the river. Public ownership of it seems to be one answer. That if it is in public domain, then there isn't a question for cost recovery. If something happens to it, if it

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happens to be managed as natural area, i.e., floodplain riparian habitat.

I, too, spent time on the Colorado River and the Gunnison River, and I have gotten in on the Gunnison River in Delta and come down to Whitewater. In case you haven't done it, it is a seven-hour trip in a canoe, and I have done it in July and in December. I am not necessarily for wild and scenic, because I think, that among other things, there happens to be several orchards and several roads and quite a few ranches along that stretch of river that probably take it out of the wild and scenic area or regime, but disposal of any public lands along that further limits anyplace that a water surface water recreationist can get off of the river. As would disposal of any public properties along the Colorado River, be it in Glenwood or all the way to the state line, with those exceptions that are unaccessible by vehicle. Thank you.

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(9:04 p.m.)

MR. CARIE: Questions?

MR. KEETON: No.

MR. CARIE: Is there anyone else who would like to make a statement? Yes, sir,

thank you. G. R. Wenger.

MR. WENGER: G. R. Wenger from 392 30 Road from Grand Junction. I would like to comment about the Wild Horse Management Area. According to research I have done, there were no wild horses in the Book Cliff area prior to 1945, at which time a rancher died and his horses were

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allowed to run loose. Since then, they have increased to the size of their present group, and it just doesn't seem logical to me that on the basis of domesticated horses that have gone uncorraled or wild, we have established a wild horse refuge. I think it should be abolished as part of the plan. Thank you.

(9:05 p.m.)

MR. CARIE: Thank you. Questions?

MR. KEETON: (Moving head up and down.)

MR. CARIE: Are there any other?

MR. LITTRELL: I have a question.

MR. CARIE: Speaker, questions.

MR. LITTRELL: Mr. Wenger, in the case of the Wild Horse Range, did you mean abolishment of the total range or just the expansion of the range?

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MR. WENGER: The total range for the wild horses. I don't think they are wild horses. They don't have generations and generations of horses, there are just four or five generations since 1947 to the present time. Thank you.

MR. CARIE: Thank you. Anybody else wish to make a statement? Does the panel have any closing remarks, questions?

MR. CARIE: Sir?

MR. PRATHER: I would like to continue, just two or three more.

MR. CARIE: That is Mr. Prather. Step up here, Bill, finish your testimony.

(9:06 p.m.)

MR. PRATHER: There is one other important thing I think we need to bear in mind, that that is we land owners who live adjacent to this BLM land are solely responsible for the fences between the government land and ourselves. Where private land owners are adjacent, you share in that expense. The wildlife are very destructive to these fences in these rural-like areas. They go through and tear them down and then when the our livestock ventures out on the

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land, we are subject to trespass. I believe there should be something addressed to this, especially if you are going to increase the wildlife.

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On the Page 209, there are 20 Preferred Alternative Impacts. It lists about everything. Forestry, wildlife, cultural resources, visual resources, but once again, there is nothing about the impact on agricultural in the area. Under the Impact on Social and Economic Conditions we have the same thing.

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On Page 49, under the Continuation of Current Management Plan, as well as the others, a proposal to provide deer winter range for a 208 percent increase in deer. A little later, it states that the deer summer very little on private lands. This, to me, means that I am going to have twice as many deer on my summer land. It seems like that they are just crowding a little more all the time.

82

In summary, just as planning and residential areas concern itself with impacts of adjacent areas, so should the planning on BLM lands concern themselves with the adjacent land owners. I don't believe you have done all you could in this, and I would strongly support your

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finding that the Little Book Cliff Wild Horse is not satisfactory. I know, for fact, there are roads there, one of the roads went across some private land I had. These people talking about access, we tried to be good citizens, we allowed the public to use the road as access to the BLM, subsequently the authorities came in and declared it a public road, right across our private land, and I also happen to know that there is private land in that Wild Horse Area out there because it is mine, and strange thing about it, I put my cattle in there, the first one through to check the gas wells leaves the gate open. I don't know exactly what would happen to me if my cow got in that Wild Horse Area, but I guess they couldn't kill me and eat me, but I don't know how much short of that they might stop.

One more page, Public Lands, this is on Page 127. Public land contains only a relatively small percentage of big game summer range. Twelve percent. To me, this shows, without any doubt, that the private land owners are being forced to feed all these wildlife which have increased from 50 to 200 percent in the Roan Creek area, not only in deer, but elk, also, in the last 15 to 20

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A5

years. I just think some consideration should be given to us on that. Thank you.

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(9:10 p.m.)

(Applause from audience.)

MR. CARIE: Thank you. Are there anymore statements to be made? Question? Statement?

MR. LITTRELL: I would just like to make a statement. I felt like the comments were very good this evening and I want to thank you all for coming out, giving us your input, and I want to guarantee you that we will give them all due consideration when we get down to looking and making final decisions as far as this resource management plan is concerned, so, thanks, again.

MR. CARIE: Seeing there is no one else to speak, I will begin to close the hearing. That I thank all of you for attending, I want to assure you that your spoken and written views will be part of the permanent records, these records will be open for further written statements or letters until July 17th, 1985. You may send your written comments to the Area Manager, Grand Junction Resource Area, Bureau of Land Management, 764 Horizon Drive, Grand Junction, Colorado 81506.

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Thank you, and I hereby declare this hearing adjourned.

(Proceedings Concluded 9:11 p.m.)

A

CERTIFICATE

STATE OF COLORADO)
) SS:
COUNTY OF MONTROSE)

I, Julie A. Ward, Registered Professional Reporter, and Notary Public, State of Colorado, do hereby certify the facts as stated by me in the caption hereto are true; that the foregoing testimony as indicated was made before me by the speakers hereinbefore named, and were thereafter reduced to typewriting by me and under my supervision; and that the same is a true and accurate transcript of my stenotype notes then and there taken.

I further certify that I am not employed by, related to nor of counsel for any of the parties herein nor otherwise interested in the outcome of this action.

In witness whereof, I have affixed my signature and seal this 24th day of May, 1985.

Julie A. Ward

Julie A. Ward, RPR
P.O. Box 1184
Montrose, Colorado 81402-1184

My Commission
expires: 1/2/89
Job no. 85-122

B

REPORTER'S TRANSCRIPT

GRAND JUNCTION RESOURCE MANAGEMENT PLAN
(PUBLIC MEETING NUMBER 2)
May 14, 1985

BE IT REMEMBERED, that on this, the 14th day of May, 1985, at the Gateway Community Center, Gateway, Colorado came on for hearing at 7:28 p.m., the foregoing public meeting before Mr. Lee Carie, Oil Shale Project Manager, and before Julie A. Ward, Registered Professional Reporter and Notary Public in and for the State of Colorado, whereupon the following proceedings were had:

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MR. KEETON: Thank you.

MR. CARIE: Sorry, Jim. Oh, I am sorry, sir, could I have your name, please?

MR. MOORS: Vernon Moors.

MR. CARIE: We will begin the formal testimony now. If you would, please begin your oral statement by stating your name, address, and the organization you represent, if any. Please use the microphone here at the front of the room so the reporter can hear the words, and please speak slowly so the reporter can catch all your words.

Are there any members of the Governor's office or members of Congress or their staff, members of the State legislature, County officials, Local government, State agencies or Federal agencies here that want to speak tonight?

(Silence from audience.)

Now, for the individual speakers. Our first speaker is Lyman Hubbard. Mr. Hubbard.

(7:37 p.m.)

MR. HUBBARD: I am Lyman Hubbard and Box 139, Gateway, Colorado, zip is 81522, and I just want to represent Hubbard Mining Company that used to exist, but due to the declining

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market, it is on standby, but I want to go on record as a concerned citizen, and I would like to see the area basically kept open to multiple use like it has in the past and -- and with very little change in the wilderness areas, kept to the minimum, because of the small amount of the population that gets to use the wilderness areas, and this is my main concern and the -- due to the limited population, that I mean percentage that get to use these things, I think we should not -- we should strike off a balance between the percentage people that get to use them and have not more than that many percent of the acres of public land designated for the wilderness areas, is one of my -- I mean a fair -- as I see, a fair way to strike a balance on how many acres there should be.

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And, then, I would like to check with the group on this PIL money, that Payment In Lieu of Taxes, and how it -- I would like to check and see if it is paid in an equivalent amount, as the ranchers are having to pay, per acre, in Mesa County, in particular. It is my understanding that the PIL money does not always meet what the private land owners are paying in taxes for the

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same type of ground, and that was one question I had tonight that I would like to -- if anybody would comment on it, I would like to hear. And that -- that was my two main concerns.

MR. CARIE: Okay, sir. Thank you. After the -- after the formal presentations, we -- you will have the opportunity to ask questions then.

MR. HUBBARD: Oh, okay.

MR. CARIE: Okay.

MR. HUBBARD: Thank you.

MR. CARIE: You bet. Thank you. Mr. Paul Petersen.

(7:40 p.m.)

MR. PETERSEN: Yeah, my name is Paul Petersen, I am from Grand Junction, 2888 Durango Drive is my address.

I am just here as a concerned citizen, and somebody who has lived, for a long time, on the Western Slope, in fact, just about all my life.

I tried to wade through most of the RMP, and first of all, I would like to thank you for, I think, a job well done. You seemed to have addressed all the issues pretty fairly and pretty --

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pretty balanced basis. I want to make a few comments on wilderness.

It did seem to me like that the wilderness recommendations, the suitability recommendations in this Resource Area followed -- all followed along the lines of whichever areas there weren't any conflicting use with. The areas that received a suitable for wilderness recommendation were for areas that you didn't see anything better to do with. If there was any kind of conflict with wilderness use, or some other use that might conflict with the area being designated wilderness, that was the use that you chose. Even in some places with pinon and juniper woodlands, which, surely, are available in a lot of places in the -- in the Resource Area, outside of areas that have been noted as being suitable for wilderness, so, I just -- I just think that as far as your priorities, wilderness use ended up way, way down the list, probably on the very bottom.

If there was any other possible use for the area that was what it got recommended as being used as, and I don't think you tried real hard on some of the management problems to -- to make a manageable wilderness or wilderness boundary.

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One of the -- I have been to these areas, and I have hiked around these areas, particularly along -- along -- along this western side of the state, and the Sewemup, Palisade, Dominguez and Black Ridge are some areas that I am real familiar with, and I have hiked in them a lot. They are all -- they are all worthy of wilderness suitability recommendations.

I think one of the things that I want to try to emphasize here, is that in Gateway that, economically, there is not very much going on here, and it has been slow for the people that live here. I was just reading the other day that travel and recreation is the second fastest growing industry in the world, and that in that industry, the fastest growing segment is in adventure-type recreation.

That is things like rock climbing and white river rafting -- whitewater rafting, those types of activities. You have a perfect opportunity to set aside some areas that are prime for that kind of recreational use and by designating those areas, you will really put Gateway on the map as an area focal point for that kind of recreation, and it might just bring in

some -- some outside recreationalists and tourists from all over the country, if they look at Gateway and see those kinds of areas on a map, because the Palisade is a prime area for hard rock climbing, for technical climbing. The Dolores River is a prime area for whitewater river use, and I think that it would -- in the long run, it would benefit the community and the areas if they were -- if they were designated as wilderness and preserved.

One other thing I would like to make a point on, the Dolores River, since in the RMP you decided to manage the Colorado River as a recreation area, and I think that since the Dolores was in the same Wild and Scenic River study as the Colorado, the lower portion of the Dolores should be managed in the same way as that portion of the Colorado that was in the same study. I think you should just have the same type of management for both. They are both the same status.

That is all I have to say. Thank you.

(7:45 p.m.)

MR. CARIE: Okay. Any questions of the panel or --

MR. LITTRELL: I would like to ask

Paul a question, if I could. Paul, you mentioned that the Palisade was a prime area, I think what I heard you say was a prime area for climbing.

MR. PETERSEN: Uh-huh.

MR. LITTRELL: And I have heard other people, in the past, say that it was -- the rock was really too soft to be a good area to climb, and this kind of stuff. I would just like to have your thoughts on it, Paul.

MR. PETERSEN: Well, one of the reasons that it is a good area for climbing is because the rock is a little crumbly in comparison to some really hard, hard granites but it is an area that is accessible almost all year, where the other areas are almost snowbound on winter camp. I know, at Mesa College, the recreation people there teach rock climbing in Unaweep Canyon and so did Marmot when Marmot was teaching classes in technical rock climbing. They used the walls of Unaweep Canyon to teach their classes, so evidently, it is one of the best areas available right here in west central Colorado, I should think.

MR. LITTRELL: Thank you.

MR. CARIE: Do we have anybody else

that would like to make a statement at this hearing? Does the panel have any closing remarks?

MR. LITTRELL: The only thing that I would like to say is I appreciate all of you coming out this evening, I appreciate the two individuals, very much, that did get up and give us comments, and we will be around for awhile after the meeting closes and visit with you, whatever.

MR. CARIE: Yes, sir.

MR. KEETON: I would just like to emphasize that written comments can be received until July 17th, and they will receive the same weight as any testimony received orally, and if you haven't waded threw this big document yet, we would appreciate any written comments, and they will receive the same weight as the oral testimony here tonight.

MR. CARIE: Thank you. Mr. Hubbard, we haven't forgotten your question, but after the hearing is over, perhaps one of our people here can answer it for you.

MR. HUBBARD: Okay. I would like to know, because that relates to another problem we are having here.

MR. CARIE: Okay. Seeing that there is no one else to speak, I will begin to close the hearing.

I want to thank all of you for attending this hearing tonight. I want to assure you that your spoken and written views will be part of the permanent records. Those records will be open for further written statements or letters until July 17th, 1985. You can send your written comment, your written comments, to the Area Manager, Grand Junction Resource Area, BLM, Grand Junction, Colorado, 764 Horizon Drive, zip code 81506.

Are there any other statements to be made before I close the hearing? Thank you, and I declare the hearing adjourned.

(Proceedings concluded 7:49 p.m.)

B

CERTIFICATE

STATE OF COLORADO)
) SS:
COUNTY OF MONTROSE)

I, Julie A. Ward, Registered Professional Reporter, and Notary Public, State of Colorado, do hereby certify the facts as stated by me in the caption hereto are true; that the foregoing testimony, as indicated, was made before me by the witness hereinbefore named, and were thereafter reduced to typewriting by me and under my supervision; and that the same is a true and accurate transcript of my stenotype notes then and there taken.

I further certify that I am not employed by, related to nor of counsel for any of the parties herein nor otherwise interested in the outcome of this action.

In witness whereof, I have affixed my signature and seal this 24th day of May, 1985.

Julie A. Ward
Julie A. Ward, RPR
P.O. Box 1184
Montrose, Colorado 81402-1184

My Commission
expires: 1/2/89
JAW/job no. 85-122

C

BUREAU OF LAND MANAGEMENT

Resource Management Plan

Public Hearing

Foothills Ramada
11595 West Sixth Avenue
Lakewood, Colorado 80215

May 20, 1985

The above-entitled matter came on for public hearing on May 20, 1985.

BEFORE:

FRANK YOUNG, Presiding Officer

PANEL:

RICHARD ARCAND, Chief of Planning, Grand Junction District.

FOREST LITTRELL, Area Manager, Grand Junction.

JIM KEETCH, RMP Team Leader, Grand Junction.

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(No audible response.)

PRESIDING OFFICER: Do we have any official of a federal agency or a federal -- who would like to speak?

(No audible response.)

PRESIDING OFFICER: Seeing none, we will move on to the registration cards.

Our first speaker is Lawrence A. Papp. Mr. Papp, would you please use the podium here? The microphone is connected, and you have ten minutes.

MR. LAWRENCE A. PAPP: My name is Lawrence A. Papp. I live in 6224 Powell Road, Parker, Colorado, and I would like to comment mainly on the wilderness aspect.

I'd like to thank the members of the BLM for taking the time to explain to me the different alternatives, and I'd like to say that I would support the protection alternative as my choice. Some of the problems I see in the preferred alternative is that 20,000 deleted from the Black Ridge because of various problems with trespassing between federal land and private land. Also, the Palisade area has been determined to be unmanageable because of shake and I would like to--I'd prefer to see that area remain as a wilderness study area and recommended for wilderness.

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The Demaree Canyon area I think is important to wildlife and also should be included in the--as a wilderness area. I think the Sewemup Mesa area has good boundaries, and I support

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that. I understand there is quite a bit of conflict in the Little Book Cliffs, and I realize that some of those conflicts are out of the hands of the BLM due to pre-1976 leases, but I would still support that area as a wilderness.

I've got a few more here. The Delores River I think should be withdrawn from mineral -- as the other river areas were, and many of the areas that would not be recommended for wilderness but would be recommended as roadless and managed basically to protect their characteristics, I would support that. That's about all I have. Thank you.

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PRESIDING OFFICER: Do you have any questions, panel?

(No audible response.)

PRESIDING OFFICER: Okay, thank you, Mr. Papp.

MR. PAPP: Thank you.

PRESIDING OFFICER: Our next speaker is Rocky Smith.

MR. ROCKY SMITH: My name is Rocky Smith, and I live at 1030 Pearl Street in Denver, and I'm here representing myself, although I should add that I am a member of the Colorado Open Space Council Board of Directors, and I'm also a member of the Conservation Committee of the Colorado Mountain Club, and I'm not representing anyone besides myself, but I think a lot of people feel somewhat as I do.

First of all, I'd like to thank the BLM for having this hearing in Denver. It gives us a chance to, us residents of the Denver/Boulder metropolitan area a chance to comment on

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these lands that we don't get to visit too often because they're so far away, but we still do care about them and we appreciate you coming to Denver and allowing us that chance. And also, I'd like to compliment the BLM for running the RMP the way they did. It's one of the better management plans I've seen. I've read quite a few of them, both BLM and Forest Service, and this one is one of the easiest to understand. It has a lot of things in it, not all of which I agree with, but at least I can find out what's planned, sometimes the reason for it, and there's a lot of information in there and I compliment you on that.

I'm going to mainly comment on the wilderness recommendations, some of which I agree with and some of which I don't. First of all, I'd like to talk about the need for wilderness in general, which I think is greatly increasing in Colorado. Various studies have shown the annual increase to be anywhere from two to ten percent annually; I believe somewhere in the draft RMP the BLM uses the latter figure. There's no question, in any case, that there is a great demand for wilderness in Colorado, and the BLM has a unique opportunity to add areas to the National Wilderness Preservation System that are not well-represented in that system at present.

Most of the areas, in fact, just about all the areas that are presently in this system in Colorado are the so-called high altitude rock and ice wildernesses, which are very nice, but the BLM has a golden opportunity to add many of the lower

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elevation wilderness areas to the system, which would provide diversity and provide protection of areas that are not presently protected and that I think we need to protect.

Commenting on the areas individually, two areas that have a lot of conflicts are Demaree Canyon and the Little Book Cliffs area. It is unfortunate that both of these areas are blanketed with pre-FLPMA leases, making protection almost impossible, or at least difficult. Also, though, these areas do
204 have many fine attributes that would make them good candidates for wilderness protection. I would recommend that the BLM, if possible, not give a recommendation on these as yet and see how many, if any, of the pre-FLPMA leases are developed, or if they expire. If that should happen, it is possible that all of either area or parts of either area could be designated wilderness if the leases are given up and not drilled upon, not developed. As I say, these areas both have excellent wilderness attributes and it would be a shame to prematurely deny their chance for being included in the National Wilderness Preservation System.

Next there is Black Ridge Canyon and Black Ridge Canyons West. This is a very nice area and I'm pleased to see that the BLM has recommended that the Colorado Ridge Road be closed, or that the areas be joined and form one fairly large area. There is also some land added on the south end of Black Ridge Canyons, which apparently qualifies for wilderness, and I'm pleased to see that recommended for wilderness, also. This

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area has excellent wilderness attributes and we're glad to see that a lot of it's going to be recommended for inclusion in the Wilderness Preservation System. I think the BLM, in the final
208 RMP, should recommend one change in the draft recommendation, and that is that the road going up Rattlesnake Canyon to the archway should be closed at the WSA boundary rather than--or rather down where it's continuous with the rest of the boundary rather than allowing vehicles up. I understand that the BLM had to -- to an emergency closure to prevent damage to the arches. I think that the road should be closed even further down to make sure that it's more difficult for vehicles to get up and this would further protect the beautiful arches in Rattlesnake Canyon.

The next area I want to talk about is the Palisade. This area, at least according to the BLM's description, is another excellent area with very good primitive recreation and outstanding opportunities for solitude. It is a mystery to me why this area is not designated wilderness. In the BLM's own words, almost a direct quote here out of the draft RMP, Chapter 4, "non-designation of the Palisade wilderness study area would be a major adverse effect for primitive recreation," and it would also be a major adverse effect for--not for foregoing a chance to include a very unique and ecologically diverse unit into the wilderness system. This area has a lot of unique attributes and I do not see any reason at all, reading the draft RMP and EIS, that this area not be recommended for wilderness. It has

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just about no, or very low oil and gas potential and hard rock potential, and I really think it should be in the wilderness system, so I request that the BLM change this recommendation.

The next area is Dominguez Canyon. This is the largest area in the state, I believe, BLM wilderness study area in the state, and I do not quite understand why the BLM chops
203 off about 19,000 acres in the acreage recommended for wilderness designation. I understand that there are some fairly productive pinon and juniper stands in the area that is cut out, but I don't believe that--I do believe, rather, that these--that any needs for firewood can be found elsewhere on the resource area. I think wilderness is really very important. As I said earlier, the need for wilderness is increasing rapidly and I think that the other resources, where there's no direct conflict, can be met elsewhere. So I request that this recommendation be changed to include the WSA boundary.

And then we have the Sewemup Mesa area. This sounds like an excellent area which I do intend to visit sometime, and I'm pleased to see that it is recommended.

I'd like to sum up by reminding the BLM that wilderness is a unique resource that once destroyed by an activity of man cannot be replaced, or at least not in our lifetimes; whereas resource extraction can be done in many other places besides the areas that qualify for wilderness. Now, I think the BLM should look at this and make the changes in the areas recommended that

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I have suggested, and I think that the public and the United States and Colorado will benefit from having the maximum amount of wilderness.

Thank you.

PRESIDING OFFICER: Are there any questions from the panel?

MR. KEETON: I have two questions. Concerning Demaree, I wasn't sure if I heard you correctly, but you said that BLM should delay any recommendations concerning Demaree and Little Book Cliffs until the existing oil and gas leases, pre-FLPMA leases have been acted on or expired?

MR. SMITH: Yes, if that's possible. If the leases are brand-new, you'd have to delay your recommendations for ten years. That might not be possible. But if they're about to expire, as a substantial number of them are, and especially if they are continuous, are about to expire, then that could possibly make, you know, a good portion of the area--at least more than 5,000 acres--available and suitable for wilderness. That's why I said that.

MR. KEETON: The second question is concerning the road in Rattlesnake. You mentioned the road coming up. Are you talking about the retrail, or are you talking about the road that comes down off of Colorado Ridge Road and turns into Rattlesnake Canyon?

MR. SMITH: In Black Ridge?

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MR. KEETON: In Black Ridge.

MR. SMITH: It was referred to a couple of different ways in the RMP or on maps. It's the road that splits the area and splits, I believe like this coming--it comes this way going north and splits.

MR. KEETON: Okay. You're talking about Colorado Ridge Road, closing that road through the arches at the boundary then, let's say, rather than leaving a trail that comes up from the bottom.

MR. SMITH: Okay. Well, as I understood it, that road was what separated the two areas and that's why they were analyzed separately. Then there was another road up Rattlesnake Canyon that starts just to the southeast of the Colorado Ridge Road, or enters the WSA just southeast of there, and I requested that that road be closed for the protection of the arches.

PRESIDING OFFICER: Thank you.

Our next speaker is Daryl Anderst.

MR. DARYL ANDERST: My name is Daryl Anderst. I live at 1620 South Clayton in Denver. I am representing myself tonight.

I have lived in Colorado for ten years and I use the Grand Junction Resource Area for hiking, camping, and photography. I especially enjoy the beautiful canyon country in this resource area. I am interested in the wilderness resource part of the RMP because I believe that wilderness is needed not only

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for the resources it has to offer, but also to protect against the ever-present land developers and resource extractors.

I support the BLM's decision to recommend four out of seven wilderness study areas for wilderness designation. Recommending so many areas in one resource area is a departure from the usual one or two areas that other BLM resource areas recommend, but I feel that four out of seven will not be enough. I urge the BLM to recommend to Congress that all seven of the wilderness study areas be added to the Wilderness Preservation System. The conflict with the pre-FLPMA leases that this action would create in the three wilderness study areas should be resolved in favor of wilderness, given the seriousness of the increase of population and pollution expected in Colorado in the near future.

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The alarming increase in air and water pollution should indicate to us that development is out of control. We have very little undeveloped land left to buffer the increase in pollution, so the land must be given maximum protection in order to keep the greedy little hands of the polluting developers off of it. They are so controlled by greed, that they will not rest until every acre is either sawed, grazed, blasted, drilled, or dammed.

The Grand Junction resource area contains magnificent canyon country. I urge the BLM as trustees of this superb land to take every measure possible to protect it. Roderick Nash has

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suggested that in order to protect our land from uncontrolled development, we need to make a major shift in values. He says: "I want people to think of the land not as a commodity they possess, but as a community to which they belong."

I'd like to thank the BLM for this opportunity to comment on the Grand Junction Resource Management Plan.

PRESIDING OFFICER: Are there any questions from the panel?

(No audible response.)

PRESIDING OFFICER: Thank you, sir.

Our next speaker is Jim Bock.

(Off the record to change the tape.)

MR. JIM BOCK: First let me introduce myself. I'm Jim Bock of 1859 23rd Street in Boulder, Colorado. In this first few minutes of the hearing I see two intentions appropriate to the speaking. The first is to say, "I come to praise Caesar, not to bury him this time," and I do intend to compete with the dinner party next door. The microphone is working somewhat. I don't know if maybe the previous people couldn't hear as well, but if it isn't, I'll try to make up for it.

I would like to commend the BLM on at least two points: first of all, for having given a broader, more realistic consideration for wilderness and wilderness values, as expressed in the protection alternative. I support not only the particularly wilderness recommendations, but also the agency's

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suggestion for managing the road areas.

Specifically, I commend the Agency for proposing the closure of the road separating the two areas of Black Ridge. I also urge that the full 79,000 acres be considered for wilderness in the Dominguez area. I feel that the Palisade area deserves protection, as do Demaree Canyon and the Little Book Cliffs wild horse area.

The second main commendation the BLM deserves is for the fact that this hearing is being held on the east slope. One reason that the only BLM areas I've seen near Grand Junction are Bang's Canyon and Rough Canyon is that I'm usually too busy driving to southern Utah whenever I'm in that part of Colorado. It seems that half of Boulder drives twice as far as Grand Junction every spring to see many features possessed by the very roadless areas we're discussing. I can understand that many west slope residents would be just as happy to see its east slope -- rights gone through and vacation in Utah, but it seems to me that it's only a matter of time before we of the east will be the -- defined, "desert areas to --" at only half the distance we're used to driving.

My suggestion, then, is that if these roadless areas need an economic justification for wilderness designation, they will attain this by playing an important role in keeping our tourist dollars within Colorado.

PRESIDING OFFICER: Are there any questions by the

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panel?

(No audible response.)

PRESIDING OFFICER: Thank you.

Is there anyone else having trouble hearing?

(No audible response.)

PRESIDING OFFICER: I'd like to remind you all to speak up. The party next door has died down a bit. If they start to roam again, we'll--I'll remind you to speak louder.

MR. KEETON: Yes, one thing, if you would speak into the microphone, and it would help if you would either raise it or lower it and stand about two inches from it; in here.

PRESIDING OFFICER: Thank you for the expert advice.

Our next speaker will be Martin Walter.

MR. MARTIN WALTER: I have a little something for you here.

My name is Marty Walter. I'm a mild-mannered mathematician who resides at 3333 Nebo Road, Boulder, Colorado. It's not actually in Boulder, it's in Jamestown Star Route.

An inexorable wilderness eating process has brought us to this point today and that's the point of the little map you have in front of you. On the top is a little diagram or map of existing wilderness areas in the United States, de facto, not necessarily protected in any way, but just de facto wilderness areas and that's by the--produced by the Wilderness Society and just in case anybody thinks it's a Commie plot, we know that the

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government doesn't lie and the photo below it is a picture taken by satellite, actually a composite of several different areas of the United States which shows, in fact, that the--there are very few wilderness areas left in the United States. The eastern half of the United States is practically totally lit up, and there is not much left in the west, actually.

Therefore, as a general comment, I would like to say that the burden of proof should be on those who would change our de facto wilderness areas to non-wilderness areas via mines, oil and gas development, et cetera. For example, Demaree Canyon and Little Book Cliffs wild horse area, these wilderness designations should take precedence over oil, gas, and mineral development. We should put our minerals and oil and gas that exist there in a wilderness bank, so to speak, and let a future President or Congress remove them if, you know, we end up fighting the Nicaraguans or something full tilt.

Just one specific comment, or a couple specific comments from my own experience. I've floated, swum and kayaked much of the Dolores River over the past years, even before the McPhee Dam was put in, and I recommend withdrawing this entire quarter for mineral development. And another little comment I'd like to make here, a few years ago when the oil shale development was going full tilt, I took a little hike. I can't remember exactly where it was, but I can take you there. This oil shale company had fenced off some public BLM land near Grand Junction,

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and they discouraged the likes of me from visiting it, and I believe that it is within one of the boundaries of one of these WSA's. So, in general, I support--to make a long story short--I support the protection alternative, or, in the words of the BLM, I support the Pro A of the RMP, and I think there are many ONA's in and out of the WSA's herein considered. The SRV's and the VR's are incomparable. The RMA's are scientifically very important. The lives of the T&E's should take precedent over the TPC's, MMRF's, IRMA's, AUM's, APD's and oil, gas, and minerals. To sum it up, I think the whole area is an ACEC to me.

I love the western slope and the canyon lands for which it is a gateway, and I thank you very much for holding these hearings in Denver so that I could comment on them. Thank you very much.

PRESIDING OFFICER: Are there any questions from the panel?

MR. LITTRELL: I'd just like for you to be sure and get that last comment in writing, so I can have a copy.

PRESIDING OFFICER: Thank you, sir.

Our next speaker will be Susan Hamilton.

MS. SUSAN HAMILTON: My name is Susan Hamilton, and I live at 2711 Mapleton Avenue in Boulder, and I want to thank the BLM for having this hearing here in Denver. It makes it very convenient, and I wish to commend the BLM for recommending that approximately 150,000 be designated as wilderness.

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I was a trail hike host in the Indian Peaks Wilderness Area last summer and I hadn't spent time in the Indian Peaks area for over five years, and I was really shocked by the damage that overuse can cause, particularly soil compaction. The trees were dying. The whole area looked like it had been bombed out.

Obviously, the demand has outstripped the carrying capacity of the wilderness areas. Increased acreage is needed to absorb the increased demand. I wish to encourage the BLM to reconsider recommending for wilderness designation Demaree Canyon, Little Book Cliffs, and the Palisade wilderness study areas, and portions of Dominguez Canyon and Sewemup Mesa.

Thank you.

PRESIDING OFFICER: Are there any questions from the panel?

(No audible response.)

PRESIDING OFFICER: Thank you.

Our next speaker will be D. Cohen.

MS. DOROTHY COHEN: My name is Dorothy Cohen. I reside at 2845 Elm Avenue, Boulder.

I'd like to thank you for having the hearings in this area, close to the Boulder/Denver area, so we can come and present our thoughts. I'd like to support the BLM recommendations for the area governing Sewemup Mesa. I'd like to encourage them to continue the boundaries in Black Ridge Canyon and Dominguez Canyon, especially because of the archeological sites and the

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wildlife areas. I'd like to recommend continuation and some improvement in the non-motorized recreation areas, and I'd like to especially point out the research stations in Fruita and -- Valley for (unintelligible) endangered species, and geological sites. I'd like to encourage the protection of the Dolores River and the -- mineral development, and I'd like to point out that the BLM land have wilderness experiences that are different from other areas, and I'd like these to be continued so that we can continue hiking and rafting in these areas.

PRESIDING OFFICER: Are there any questions from the panel?

MR. LITTRELL: Dorothy, I never got what you said on the Demaree wilderness study area. Could I get you to repeat that, please?

MS. COHEN: I just recommended the--it was Dominguez Canyon, I think.

MR. LITTRELL: Oh, I'm sorry, okay. I'm with you now. Okay.

PRESIDING OFFICER: Our next speaker will be N. J. Mullen.

MR. N. J. MULLEN: My name is Norm Mullen. I reside at 1975 Norwood in Boulder, and I'm representing the Colorado Rivers Coalition tonight, which is a coalition of individuals and organizations concerning protecting wild rivers in Colorado, and in that light, I'd like to urge protection of the Black

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Ridge areas and the closing of the roads as recommended in the preferred alternative, and I'd also like to see some thought given to closing off the road to the arches a little farther back from what's recommended. 208

I've been through the arches both from on top and hiking up from the river, and I'm very concerned about the impact that so many people traveling--well, when I was there it was only a couple hundred feet from the roads to the arches, and I guess now it's been closed off a little farther back, but still, I'm very concerned about the impact on the arches.

Also, I'd like to urge protection of the corridor on the Dolores and withdrawal from mining. I think a big chunk of that section has been recommended for protection under the Wild and -- Rivers Act, and I think it's appropriate to withdraw it from mineral entry. 177

I'd like to speak for myself a little bit, outside of the river considerations. I have hiked in Black Ridge, Dominguez, Little Book Cliffs, Demaree, Bang's and Rough Canyons, and have been near Hunter/Garvey, and I think all those areas should be protected. I think not only should the protection alternative be adopted for wilderness protection, but further consideration should be given to all the areas that were dropped during the intensive and initial inventories that I just mentioned. South Shore Ridge, for instance, has some of the most impressive -- rock formations and colorful cliffs that I've ever 210

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seen.

I haven't been there, but I'd like to urge protection of the Palisade. It looks very impressive, and I'd like to get a chance to go there sometime without it being eaten up by oil and gas development.

I also would like to thank BLM for holding this hearing and giving us folks over here a chance to talk. Thank you.

PRESIDING OFFICER: Are there any questions?

MR. LITTRELL: Norm, when you say urge protection, are you saying beyond what has been recommended in the protection alternative, or are you in agreement with what's in the protection alternative?

MR. MULLEN: For?

MR. LITTRELL: For the Palisade, Bang's Canyon areas, the different areas you mentioned in that.

MR. MULLEN: I'd like the BLM to manage as much as possible to keep Bang's, Roughs, South Shore Ridge, Hunter and Garvey, and I'm not sure if I'm forgetting any of the ones that made it through part of the inventory, so that they could be eligible for wilderness protection, and I'd also--I'm not familiar enough with the Palisade, but I do urge that the entire WSA be recommended as wilderness. 211

MR. LITTRELL: Okay, so you are saying that the protection alternative, then, as far as the other areas are concerned?

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MR. MULLEN: Well, although I don't think that--perhaps I'm not familiar enough, but I would urge as much as possible wilderness protection for the areas that aren't currently WSA's that I recommended, that I mentioned.

MR. LITTRELL: Thank you.

PRESIDING OFFICER: Thank you.

Our next speaker will be Linda Batlin.

MS. LINDA BATLIN: My name is Linda Batlin. I live at 680 -- Drive in Boulder, Colorado.

This testimony on the Grand Junction Resource Area Plan and EIS has been prepared by Kirk Cunningham, Conservation Chair of the Rocky Mountain Chapter of the Sierra Club, and for that organization.

These preliminary and somewhat superficial comments will cover those parts of the plan not covered by our BLM Wilderness Coordinator, Mark Pearson, at the May 13th hearing in Grand Junction. They will be supplanted by more complete written comments later.

Even casual visitor to the public lands in the Grand Junction area will notice some land use problems and opportunities. First, the area has considerable recreational use of all types, both motorized and non-motorized, and this use obviously puts pressure on the natural environment.

Second, the natural environment is unusually brutal with a dry climate, fragile, salty, and highly eroding soils,

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and damaged riparian zones. Third, despite the difficult physical conditions, there's enough variety in habitat types to support a similarly wide variety of wildlife species. Finally, fossil fuel resources are considerable, with visible impacts. How does this plan in its preferred alternative deal with these resource issues?

By comparison with other BLM plans in Colorado which I have examined, this one seems to be more competent and careful than most, with more or less defensible conclusions. The preferred alternative is not as protective of natural qualities as it could be. Certainly, the protection alternative is the best one could hope for in that respect, but it seems to address the problems in a practical and reasonable way. One can only hope that the "activist" style of management and larger budget that the preferred alternative assumes will actually come to pass.

Specifics follow. One, the plan rightly puts substantial emphasis in all alternatives, except the current management alternative, on soils protection and water resource management. The devastation that past abusive land management has had on inherently fragile environments is seen clearly, for example, on the west side of Desaree Canyon WSA along the Baxter Pass Road. Here a huge branching arroyo system has destroyed a once productive riparion habitat and is even threatening some gas pipelines. At the same time, however, I was discouraged to see a fair number

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of cattle in this drainage. Such use is not compatible with attempts to repair the damage. The Sierra Club fully supports the maximum possible effort by the BLM to retain soil, build check dams, and restore stream channels.

In the process, BLM must make every effort to keep roads and ways out of stream channels, and to focus ORV use away from such places. Historical studies in the southwest have shown that roads improperly located can lead to arroyo cutting or maintain existing arroyos.

69 Two. Locatable minerals. The preferred alternative does not go far enough in withdrawing sensitive recreational lands from mineral entry. Among the areas that I'm personally familiar with, the Rabbit Valley area, the Unaweep Seep, and Desaree Canyon all deserve protection for various reasons peculiar to them.

27 Three. Coal Resources. The preferred alternative puts too much emphasis on coal leasing at the expense of surface resources. Granted that most of the coal is not strippable, and so its extraction would have few surface impacts, still it is hard to imagine why the emphasis is on this resource, located so far away from potential markets and expensive in any case. Certainly, proposing leasing in WSA's or other scenic areas trades known esthetic values for uncertain economic ones. The protection alternative seems more realistic here.

Four. Oil and gas. Even though the oil and gas

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resource is substantial, there is a different perspective that can be brought to bear on the oil and gas/surface resource tradeoff. On page 37, the plan states that these resources will be "foregone" by surface stipulations. Of course, this is false. All surface protections, including wilderness, can be removed by Congress if we get desparate enough. The only true destruction of a non-renewable resource is its use.

72 Five. Paleontological resources. We support the BLM's designation of the Rabbit Valley and Fruita sites as research natural areas. The former, in particular, has suffered considerable vandalism and should have the expanded area under protection, as advocated by paleontologists.

156 Six. Livestock. Although livestock management is not discussed very much in the plan, we urge the BLM to place soils and riparian management above livestock production in priority, if for no other reason than that conditions for livestock will eventually improve if these resources are considered first. We urge the BLM to consider experimentation of new ideas in grazing management. Some tracts, for example, might benefit from the Savory System.

193 Seven. ORV's. The BLM will rely on an ORV map as a "primary management tool" instead of signing. While a map would certainly be useful for those who might bother to get one, I wonder if it will keep more casual users out of areas they shouldn't go into. The proposal to designate certain areas as

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high use OHV areas has merit.

Eight. Land tenure adjustments. The BLM proposes to dispose of two tracts, #304 and #301, near Colorado National Monument. We must oppose disposal of these tracts to any agency except the National Park Service. Private land in this area is already impaired by unsightly housing developments that detract from the view from the Monument. The disposal of Tract #201 north of Whitewater is also problematic, since this is a fairly large tract of mostly contiguous land in an area of high soil erosion, if I read the plan correctly. 245 246

We thank the BLM for holding one of its hearings on the plan and EIS in Denver, and we thank you for your consideration of the above opinions. Signed, Kirkwood Cunningham.

PRESIDING OFFICER: Are there any questions?

MR. LITTRELL: Could I have the numbers of those tracts again; one more time, please.

MS. BATLIN: The ones outside the monument were Number 304 and 301, and the one outside of Whitewater was Number 201.

MR. LITTRELL: Thank you.

PRESIDING OFFICER: Thank you.

Our next speaker will be Rosalind McClellan.

MS. ROSALIND McCLELLAN: My name is Ros McClellan. I live at 483 Marine in Boulder. I've been involved in BLM wilderness public commenting for some time. I was part of the-- I worked with the Colorado Open Space Council and Sierra Club

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to help start the Adopt a BLM Wilderness Program a few years ago, and I'm active with COSC and with Sierra Club.

I wanted to basically commend the BLM on the detailed and careful quality of the RMP, which seems to take painstaking attention, or give careful attention to cite specific sensitive areas in the resource area and give designations and protections that are very site specific and appropriate. It seems like a very careful approach to be followed.

There are lots of special protections a little bit like the Glenwood Springs RMP, such as resource natural areas, no service occupancy stipulations, closures to utility corridors. There is a reduction in OHV usage and natural net increase in road closures, as far as I can tell. There is a good attention to visual resource management, and to threatening and endangered species protection.

I also appreciate the fact that you have given, in some cases, non-motorized, semi-primitive designations to the-- some of the non-wilderness study areas which were in the original inventory; Bang's Canyon, Rough Canyon, Garvey, Hunter, and Granite that, for the most part, have non-motorized designations in the roadless parks portions of them, an acknowledgement of the fact that those areas were, in fact, in the original inventory and, in my opinion, were dropped for somewhat subjective judgmental reasons having to do with whether they offered opportunity for solitude based on amount of foliage or lack thereof. So I

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appreciate the fact that you've recognized their potential wilderness qualities and given them some forms of protection, although I don't think any administrative protections are as secure as wilderness recommendations.

It seems that the preferred alternative also relies to some extent on recreation and wilderness designations to protect resources, and not just stipulations attached to leases, which I consider a less reliable form of protection. There seems to be a good effort, perhaps more than I've seen in some of the other resource management plans, to try to acquire access to special public land areas, and I realize this is a very cumbersome process and I appreciate what I gather is an attempt to make some special areas available to reduce private land/public land conflicts.

There also seem to be excellent soil and water protection measures in the preferred alternative. However, in many other cases I feel that the preferred alternative doesn't go as far as the protection alternative in providing for the long-term protection of resources that are going to not be with us unless we give them more secure protection. For example, in the chart on page 68, there are a list of special management areas recommended for ACEC protection in the protection alternative and then in the preferred alternative you've dropped that type of protection. There are also a great deal more lands recommended for mineral withdrawal in the protection alternative than in the 240

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preferred alternative.

Bang's and Rough Canyon are not protected from oil and gas leasing, despite the other protections you've given them. In the preferred alternative, I would like to see you withdraw them from oil and gas leasing as well, since we don't agree, in the first place, with the fact that they are not really in the study areas. 178

I'm concerned that South Shale Ridge, which only a year ago was opened up for a renewed wilderness consideration, it seems as if you--as I think I read it--have opened up the whole area for potential motorized recreation. I would like to see that area recommended for non-motorized recreation, closed to coal and designated as an ACEC. 179

I also feel that the protection alternative in its land disposal program strikes a much better balance between land acquisition and land disposal, and has more acreage recommended for acquisition, less for disposal than the preferred alternative. I think that it's important to use disposable BLM lands for trades to acquire inholdings within the public lands in order to consolidate and make them more manageable, rather than to sell them to contribute to the national treasury. 247

Parcels -- to the Forest Service again should not be sold, but, despite the difficulties, if there's some way to retain them in public access, that will maintain their overriding public values as natural areas. 248

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The thing I guess that I most disagree with in the preferred alternative is the sweeping area designated as--or recommended for coal leasing, and it's quite clear if you look at the preferred alternative all up above the Book Cliffs area in that map, the entire area is recommended for potential coal leasing, whereas in the protection alternative there are a number of very site-specific designations to protect areas of threatened and endangered species, game animals, wild horses, watershed management, and forestry. I think that kind of detailed--the preferred alternative should, or I guess what I'd like to say is that I think that the protection alternative more accurately reflects the needs of the land and the special values in those specific areas, and that I would much prefer to see you recommend protections like this and then make special exceptions for coal, individual coal leases, than to help the priority use be coal and the other uses be subordinate to that.

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In general, I'm concerned about the sweeping coal recommendations because of the very soft coal market and the fact that the Regional Coal Team recently recommended that no further coal leasing be carried out in that region, the Payonia coal mine has just closed. There is a tremendous decrease in demand and the coal in this area, as I understand it, is deep and hard to mine. I'd like to point out that the preferred alternative has, from what I could tell, about the same amount of coal area recommended as the commodity alternative.

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In general, I feel that what you're doing in that kind of coal recommendation is foreclosing or foreclosing the survivial of irreversible or irretrievable resources like wildlife and fragile habitat in favor of a hypothetical commodity, which at this point is not materializing. In twenty more years, as I understand it, you will be revising this plan and would have a chance to adjust to changed economic conditions. I guess I'd attribute this, my somewhat aberrant recommendation which doesn't seem to fit in with the rest of the preferred alternatives recommendations to the fact that the Mineral Management Service has been merged with BLM and I'm just worried that maybe that's meant for some changes in the rate of multiple use, a mandate that's being carried out.

I'm also concerned that I detect an intention to manage very cleverly conflicting uses side by side. I think the Glenwood Springs RMP had some of the same tendencies, to say, well, we can lease for coal, and then we're also going to protect this threatened and endangered species site right next door by putting stipulations, and that takes a lot of fancy footwork and I question the management capability, especially with cutbacks in funding, to be able to manage conflicting resources in such a close proximity. That's again where I'd prefer to see this kind of management.

So all this is basically leading up to saying that I strongly favor the protection alternative. I think it

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acknowledges the overriding need to protect the very sensitive, easily damaged long-term values of the resource area which will, in a sense, are irreversible if they are destroyed to start with. I was very -- to read in the RMP the amount of threatened and endangered species, birds and other types of wildlife, mammals, whose habitats exist in this resource area. It's a migratory route for many threatened birds, and I also was struck by a study I read about recently which pointed out that many species, including threatened and endangered, are relying on increasingly shrinking habitat. The habitat's turning into --, which is separated by larger and larger areas of human disturbance so that the survival of these species is going to become increasingly jeopardized, and I think the Grand Junction Resource Area has, in itself, large sections of disturbed area, very limited sections of nurturing wildlife sustaining areas, and that the protection alternative goes--does a much better job of acknowledging that fact.

It also says somewhere in the RMP that none of the alternatives, including the protection alternative, is going to make any significant economic impact on the local economy, which to my mind implies that you could go ahead with a full scale of protections and still not damage the economy. In fact, you might even enhance it over the long run because you're protecting recreational areas.

I'd also like to suggest that whatever human--whatever

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areas in the resource area were meant to be taken over for human use, that process has been going on for a long time and that might indicate the areas that are still relatively pristine, that there isn't an overriding human need for them compared to their natural resource values.

PRESIDING OFFICER: Excuse me. You've exceeded the ten minutes. Would you like to finish up, or you can continue later on.

MS. McCLELLAN: Okay, maybe I could--maybe if there is any time at the end I could continue. Basically, I wanted to just say that I favor the protection alternative. If I had a chance, I'd like to say something about the wilderness recommendations.

PRESIDING OFFICER: We'll call on you again, then.

Are there any questions at this time?

(No audible response.)

PRESIDING OFFICER: Thank you.

Our next speaker will be Merry Havens.

MR. GARY BRENNER: Merry is not here. She wanted me to present her statement.

PRESIDING OFFICER: Okay. Would you state your own name and address?

MR. GARY BRENNER: Okay. I'm also giving a presentation. I'm Gary Brenner. I live at 1305 - 7th Street, in Boulder, Colorado.

We seem to have some experts, and one of the experts that couldn't be here is Merry, and she asked me to give this statement:

"Thank you for holding a hearing here in Golden on the Grand Junction Resource Area RMP. I am sorry that I am unable to attend this hearing, but I hope you will accept my comments as part of the records.

Briefly, I would like to comment on your recommendations released in the draft plan. I applaud your efforts in working to include provisions of the Citizens' Alternative into the preferred alternative. I think the recommendation for the Black Ridge Canyons is excellent for the area. I have visited this area several times, rafting and hiking into Rattlesnake Canyon, an arches area, and I have visited several other canyons. I am delighted that you are recommending these Black Ridge Canyons WSA's for wilderness designation.

213 I am also very please with the Sewemup Mesa recommendation. This pinon-juniper forest WSA adjacent to a national forestland of wilderness quality is a rare example of isolated and pristine ungrazed land along the Dolores, and I am grateful for your recommendations to preserve it. I would further like to see the Sewemup Mesa WSA and the adjacent national forest managed as one contiguous wilderness area."

I think she's alluding to the fact that there is an area adjacent to Sewemup Mesa which is a--it's managed by

another agency, the Forest Service.

"I hope you will change your recommendation that the Palisade WSA not receive the benefits of wilderness designation in the final plan. The Palisade is one of the, if not the best examples of ecological diversity in Colorado. The Palisade's outstanding features (the Palisade itself and its traversing life zones of desert regions to the aspen groves in the higher 205 elevations) make this diversity-yielding WSA a prime candidate for inclusion for wilderness. The diverse wildlife here reflects a diverse habitat, and the interrealtions in these micro-regions require protection gained only by managing the area as wilderness. Perhaps you could eliminate the areas that are of management concern (the firewood and ORV areas) in order to preserve the rest of the area for protection.

Demaree Canyon, just 25 miles from Grand Junction, should also be reconsidered for wilderness designation. It is a diverse terrain of desert plains and montane hills, dissected by many drainages. It provides habitat for bear, deer, and mountain lions. Your recommendations against wilderness designation in favor of oil and gas and mineral development should be weighed considering the wilderness characteristics. It is difficult to appraise the economic value of our last remaining wild lands, but oil and mineral development is miniscule in comparison. A relatively small and compact area, the Demaree WSA

should be a BLM dream to manage.

Your recommendation for Little Bookcliffs as non-wilderness is also unfortunate. Whenever my children and I visit canyonlands, the endearing Bookcliffs stand out as a faithful milestone that we can easily identify. Grand Junction's backyard provides a rare opportunity for wild horses to roam freely, as well as hiking and backpacking opportunities into solitude, surrounded by thousand-foot high sandstone canyons. Please consider the Little Bookcliffs in your final recommendations for wilderness, because it is an important component of the Bookcliffs ecosystem.

Your recommendation for 54,000 acres of wilderness out of 79,000 acres for the Dominguez Canyon should be reconsidered to include the 20,000-plus acres left out. I don't understand 203 how the deletions along the Gunnison River and Escalante Creek will prevent trespassing into adjacent lands. How does wilderness designation affect trespassing compared to other designations? This, the largest Colorado BLM WSA also provides some extremely unique wilderness characteristics just 25 miles from Grand Junction, including an abundant and diverse species of mammals, reptiles and birds.

Your 20-year-plan for the Grand Junction Resource Area is important indeed to the fate of 1.5 million acres in this resource area, including 250,000 acres of wilderness study areas. The recommendations for 150,000 of the 250,000 acres for

wilderness looks good on paper, but when the resource areas is considered as a whole, it is not good enough. The exclusions of areas under previous recommendations leave only 17% of this area even eligible for wilderness designation. You've recommended 10% of the area for protection, which is 60% of what is currently eligible, more than we usually see recommended, but less than desirable.

In closing, I'd like to reiterate and emphasize five critical components of the draft plan. 1. Your consideration of the Citizens' Alternative makes a better preferred alternative. 2. Closing the cherry stem access roads will enhance the integrity of the areas. 3. Your identification of semi-primitive areas outside of wilderness areas where non-motorized recreation will be emphasized is beneficial. 4. Your proposal to withdraw the Ruby to Horsethief Canyons corridor on the 177 Colorado River from oil and gas and mineral development is wonderful. Please consider protecting the Dolores River downstream from Gateway by also withdrawing it from mineral development. 5. Please reconsider protecting the Little Bookcliffs and Demaree Canyons from being sacrificed for extensive coal and oil and gas development."

Those are Merry's comments. How much time do I have left now?

PRESIDING OFFICER: Four minutes and twenty seconds.

MR. BOESHER: Okay, that's plenty for me because I'm

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not a specialist. I'm going to speak in more general terms.

(Off the record to change the tape.)

MR. GARY BREMNER: I'm not as knowledgeable as many of the speakers on this particular area, but I would like to speak on the general concept of wilderness protection. I am a member of the Boulder County Parks and Open Space Advisory Committee, and we manage a budget of about a million dollars a year for land acquisition in Boulder County, and I can tell you that in Boulder County we've seen a tremendous increase in the use of arid regions by the county. As soon as we designate an area for our citizens' use, it's quickly discovered and used much more intensely than we often imagine it would be.

I think the same thing is going to happen if you designate some areas as wilderness. You'll discover that people will discover the areas, and it's very very difficult to anticipate what kind of demand you will have until you start to designate these areas.

I was enlightened by the testimony of Mr. Bock and Ms. Hamilton. You'll recall Jim Bock said that he's driven past these areas to go to desert areas in Utah. I've done that myself and Ms. Hamilton said that areas in the western part of Boulder County at Indian Peaks wilderness areas are greatly overused. Well, I can second what she said.

There are areas in the county park system that are overused. We just purchased an area called Rodiff Mountain. It

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cost us a million dollars, and we are going to open it on June 1st. As soon as the public learned that we purchased it, it began to experience heavy use. There's all this pent up demand for open space, for a little bit of solitude, and this area that I'm speaking of is a desert area, basically. It's a very arid area. It's not what you would consider your normal alpine wilderness-type of an environment.

Now, the need for oil, for gas and minerals is something that ebbs and flows, while the need for wilderness is growing continually. There has not been a period in the last twenty years when the wilderness has declined, so I think you should consider that. I hope that you'll consider that. It's obvious from reading the draft plan that it was prepared by professionals, people who are in this business for the long-term, people who are serious and conscientious, and I know that what you'll want to do is be the very best managers you can be and you'll try to do more than just meet the current demand. You'll try to anticipate the future demand, and what that will require is providing some more wilderness opportunities for people.

Now, there are some areas that I know a little bit about because I have visited them. I've visited the Black Ridge Canyon area. I was on a raft trip and we docked the raft near Rattlesnake Canyon, climbed up, looked at some arches, and climbed back down. Sounds like a very quick thing. It took us

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about five hours to hike up and hike back down and it's something I'll probably never forget. I've also visited the Little Bookcliffs, and I've often noted the Palisades area and have often made a mental note that I'm going to stop there some day.

Now, I noticed in your plan that you recommend no protection of the Palisades area, and the fear seems to be that there's a lot of ORV traffic and woodcutting in the lowlands. Now, if you just look at the topo maps, you can see that if you remove the lowlands and just leave what is the most ideal area for hiking, the higher lands in the Palisades, you have a natural barrier there that I doubt ORV's or woodcutters could penetrate. What I mean is that there is a cliff all the way around most of the Palisades area, so why not designate the area that's inside the cliffs? You won't have any problems with ORV's, they won't get there, and I doubt--I doubt there are very many people that have the tenacity and strength to climb several hundred foot cliffs in order to get wood. It seems like there are easier places.

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I think you'll end up with 90% of the area, by the way, if you do that. One last thing, I noticed in your plan that you were going to close a road, and I've forgotten exactly where that road is. I want to speak in general to the advantages of closing roads.

We have found in Open Space in Boulder County, that the farther away an area is from a road, the less adverse impacts

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it gets, and this is independent of the number of users that it receives. In other words, a user who comes in on a road seems to have almost infinitely more impacts than a user who comes in walking, and this is a mystery. We haven't been able to solve exactly why this is because it isn't that the users who come in on the road are bringing in, you know, thousands of pounds of gear or something, but they just seem to be--to have more impact on the land, so if you have something you want to preserve, keep your roads away. If you leave a road, if you let a road get near, the area will apparently receive a lot more casual use, a lot less respectful use, and a lot more destruction. So I caution you against casually allowing roads to remain where they are not absolutely necessary.

Thank you.

PRESIDING OFFICER: Are there any questions from the panel?

(No audible response.)

PRESIDING OFFICER: Thank you.

Our next speaker will be David Mastronarde; excuse me with your name.

MR. DAVID MASTRONARDE: My name is David Mastronarde. I live at 2400 Forrest Avenue in Boulder. I'm the Chairman of the Indian Peaks Group of the Sierra Club, which has about 1400 members in Boulder County.

This is the first time I've been to a hearing such as

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this. Most of my experience has been in the forest and mountain wilderness areas that are in eastern Colorado, and I've found, as many others have found and as has been mentioned here, that these areas are becoming more and more crowded, and it's increasingly difficult to find true solitude and a true wilderness experience.

I've only begun to discover the spectacular qualities of the canyon country in Utah and southwestern Colorado: the quiet beauty and the great opportunities for solitude that are found there. It's clear to me that these areas are going to be used much more for wilderness in the future, as others respond to the overcrowding in the traditional wilderness areas, and as they also discover the great beauties of these other areas.

The best investment, then, for Colorado's future is to preserve as much of these roadless areas as possible for wilderness areas, and this is an investment not only for those of us here who come to this meeting, but also for the people in the Grand Junction area, because the recreation there will be a stable and growing industry, as opposed to the minerals industry, which is fraught with its boom and bust cycles.

So I commend you for the areas that you have recommended for wilderness, and I urge you to recommend all the wilderness study areas for wilderness. Thank you.

PRESIDING OFFICER: Are there any questions from the panel?

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(No audible response.)

PRESIDING OFFICER: Thank you.

Our next speaker will be Nicholas Brown.

MR. NICHOLAS BROWN: My name is Nicholas Brown and I reside at 1719 Marine Street, and I'm here representing the CU Wilderness Study Group.

First, I would just like to express my appreciation for the opportunity that we have to express our opinions here tonight, and that we're generally happy with the overall quality of the Grand Junction draft resource management plan. It seems to be one of the better RMP's that we've had an opportunity to review.

To begin with, I'd like to say that we support all the WSA's recommended by the BLM for wilderness designation: the Black Ridge Canyons, especially with the road closure, the Colorado Ridge Road closure, which we strongly support; the Sewemup Mesa and Dominguez Canyons. With the exception of the 20,000 acres deleted along the Gunnison River and Escalante Gorge in the Dominguez Canyon WSA, the boundaries seem to be fairly good in these particular three areas.

203 I'd like to say, however, that we are opposed to the particular deletions in Dominguez, especially in light of BLM reasoning for these deletions. The reasoning to delete these areas is to prevent trespassing onto adjacent private land. In our opinion, that's just not sound. Trespassing doesn't begin

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203 occurring simply because an area is designated as wilderness.

We urge the BLM to also reconsider decisions to delete the Gunnison River and Escalante areas. Another concern we have with the draft RMP is that the no wilderness recommendations for the Palisades, Little Bookcliffs, and Demaree Canyon WSA, these areas are ecologically diverse and offer excellent opportunities for solitude and unconfined recreation. They'd be spectacular additions to the wilderness preservation system. The Palisade seems kind of--virtually no conflicts, and it's of extreme geologic significance. The Little Bookcliffs and Demaree Canyon are also a unique representation of geologic features in this particular area of Colorado.

Unfortunately, these areas, Demaree and Little Bookcliffs in particular, which we wholeheartedly support, seem to be areas with some conflict. The pre-FLPMA oil and gas leases within their boundary seem to be a problem, but despite these oil and gas conflicts, we feel these areas deserve a wilderness protection just as much as the other areas.

While respecting the BLM's need to seek multiple uses for public lands being managed, I think precisely because these areas exist in areas that are full of oil and gas leases, these areas, Demaree and Little Book and Palisade should be included as wilderness areas. With only two wells having been drilled on pre-FLPMA leases in the Demaree Canyon, and only five in Little

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Bookcliffs, these areas have yet to incur significant development. There is still time for preservation here of these areas as islands in the swimming pool of oil and gas leases.

We'll always need more oil and gas if we continue on this growth for the sake of growth line that we're on, yet I think we must more importantly consider wilderness to be of legitimate public use, and remember the fact that these areas can't be recreated after they're squeezed dry from their oil and gas and coal reserves. Preserving these areas, Demaree Canyon, Little Bookcliffs and Palisade, as well, despite the fact that they have these oil and gas leases in them and surrounding them, 214 is important. Perhaps exchanging existing leases for leases outside the WSA's might be a solution.

To sum up, we feel 150,000 acres out of 250,000 acres studies is not an excessive amount, especially when one considers that many areas have already been dropped from consideration in the initial inventory, such as Hunter/Garvey Canyons, Bang's and Rough Canyons, to name just two. I might add, we encourage the BLM to manage these areas as well as Granite Creek, Northwest Creek, as semi-primitive, non-motorized recreation areas, which I guess is in your plan.

The CU Wilderness Study Group supports the protection alternative. Colorado has many resources within its borders, and it is important to realize that one resource we have is wild mountains and desert areas, and we urge you to make these areas

wilderness areas and preserve them for the future. Wilderness areas in Colorado are overused and will likely become more so as populations increase. We encourage the designation of still more areas as wilderness. We're going to need them.

Once again, congratulations on a generally well thought out RMP by the GJRA, and thanks for having this in Denver, because it would have been hard to bicycle from here to there.

PRESIDING OFFICER: Are there any questions from the panel?

(No audible response.)

PRESIDING OFFICER: Okay. Thank you.

We are getting increased competition from the band, so the following speakers may have to speak a bit louder.

Okay, Kathy Hands is our next speaker.

MS. KATHY HANDS: My name is Kathy Hands, and I live at 865 -- in Boulder, and I just wanted to make a few comments about your proposal

One of them concern the Black Ridge Wilderness Study Area that you've recommended for wilderness. Closing the road between the two wilderness study areas is a really good idea. An integrated wilderness, I mean combining the two areas, will definitely decrease, you know, the possibility of negative impacts from overuse. A comment that was made earlier about roads having more impact than just people walking in was a good

point.

Also, I believe the BLM needs to take a more balanced approach to the Bookcliffs area. Instead of opening the whole area to mineral development, the roadless areas that are in the Bookcliffs--I'm referring to Demaree Canyon and the Little Bookcliffs--should be recommended for wilderness. Demaree is home to numerous wildlife, including mountain lions, bears, deer, and the Little Bookcliffs itself is part of only three official wild horse ranges, okay, and I think that should be protected.

I don't think that the Palisade Wilderness Study Area should be eliminated from wilderness consideration. According 205 to BLM, ORV use for that make it unmanageable area. Okay, if this is true then maybe ORV use should be eliminated or curtailed because ecological diversity such as is found in the Palisades disappears every day, and what is left of it, I think, should be protected.

I wanted to make a comment about the river management portion of your proposal. I support the removal of the Colorado River corridor from mineral development, okay. I think this same treatment should be afforded the Dolores River. It's a 177 gorgeous and quite remote river. I've been there several times. I really enjoy the area. It definitely provides a chance for solitude. You hardly see anybody when you're there and it deserves to be left alone by mineral developers.

Basically, to sum it up, I support your protection alternative, just because I think the wilderness study areas that were considered for wilderness need to be designated as such. Thank you.

PRESIDING OFFICER: Are there any questions--yes, Jim?

MR. KEETON: Did you--did I hear you say that if we eliminated the ORV conflict in the Palisade WSA, that we could go ahead and recommend the area for wilderness?

MS. HANDS: Perhaps that should be considered. I mean, that's the only reason I could find that it was kind of eliminated, because it would be unmanageable because of the off-road vehicle use.

PRESIDING OFFICER: Thank you.

Our next speaker will be Jill Smith.

MS. JILL SMITH: My name is Jill Smith and I'm representing the Southwest Regional Office of the Sierra Club.

First of all, I'd like to say--oh, I'm from 2380 North 95th, Boulder. I'm originally from Oklahoma, and I've lived in Missouri, also, and I'd just like to say that out there, there aren't wilderness areas that are of a large expanse at all and that out west, and especially in Colorado, it's a really unique opportunity that we have to preserve these large areas that are just real treasures for the state, and I think it's just--it's a really rare opportunity that we have because in--

like that map shows, I believe, the entire western, I mean, eastern and midwestern parts of the country just have very limited opportunity for wilderness at all.

So anyway, I share Ros's concern for the vast habitat for endangered species in the area. It's prime hunting ground for some endangered birds and fish, and some of the creeks and rivers and tributaries. I'd also--I'd like to address some particular areas.

I have only visited the Sewemup Mesa area out of the ones that were designated as WSA's, and I was particularly impressed. I had never been desert hiking before, or hiked in the mesa country, and looking down at a rock creek canyon was pretty amazing. It was almost supernatural just the way the canyon is formed, and if you learned anything about the geological history of the area, it's pretty spectacular, and I was impressed.

I also don't understand in the Little Dominguez area why the 20,000 acres should be eliminated that is adjacent to 203 private property, because people who are going to cut across the property are going to do it whether it's wilderness or not, and I don't think--I don't see any good reason to eliminate those 20,000 acres from the wilderness.

The Little Bookcliffs also is an important wild horse habitat, which means a lot to me because of my particular interest in wildlife and animals in general, and being a unique

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area of the country, one of the three wild horse areas, I think that it's crucial that that is preserved; along with being a unique geological site.

The Palisade, I was really impressed with it because of its variation, as was stated in Merry Haven's testimony. It goes from desert to aspen forest to pine, all in one contiguous portion of the area, one small region, which is a unique ecosystem that is not found everywhere. It's pretty rare to find that in all, one all together like that, so I think that it's prime wilderness area and I think that it should really be considered.

I also support the, or I would recommend that the Dolores River be also preserved as wild and scenic, being the remoteness of it and the primitiveness of the area, and the beauty of the river. I think it would really add to the--or it already exists as part of the richness of the western part of the state, or, you know, unique little places like the Dolores.

177

I also support and commend the BLM on the closing of the road in the Black Ridge Canyon area. I don't think that the general mineral collecting that may be going on there is, I don't think it's unique to that area, that those things can be collected in other places and that those arches there are too fragile to leave them open or leave them susceptible to any damage that may occur, intentionally or unintentionally.

And just to close, I want to say in general that

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western Colorado contains several treasures that are important assets to the state, just as other states are rich in agriculture or timber or oil or minerals, and that Colorado's wilderness areas are what gives the state its character, and what charms many people into vacationing here. And I think we would really be giving up a rich resource by leaving the management of these unique and spectacular areas up to the mining interests for development or any kind of non-primitive recreational use, and I urge you to ponder and to acknowledge the important wilderness values when making your final proposal.

To conclude, I'd like to say that we do support the protection alternative in that it protects all seven of the wilderness study areas in the Grand Junction Resource Area.

Thank you.

PRESIDING OFFICER: Are there any questions?

(No audible response.)

PRESIDING OFFICER: Thank you very much.

Our next speaker will be Christa Coleman.

MS. CHRISTA COLEMAN: My name is Christa Coleman, and I live at 2180 North 95th Street in Boulder, and this is my first time at a hearing and I'm just a kid, but nevertheless, I would like to express my opinion and I'm very grateful for you giving me the opportunity to do so.

I would like to commend the BLM for the protective measures that they've taken on preserving some of the scenic

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resources and primitive recreation areas and reserach areas which were promoted in the citizens alternative, and I would like to support the protection alternative.

I praise the BLM for recommending Black Ridge and Dominguez Canyons, and Sewemup Mesa, but I don't think that 150,000 out of 250,000 acres is good enough. The Palisade is, as has been mentioned, one of the most diverse areas ecologically in Colorado. It goes from black brush desert to aspen and pine and to even spruce groves by the water. Palisade has the second deepest canyon in Colorado, and I think this would provide really exciting recreation possibilities, with a gorgeous view.

I'm originally from the east. My permanent residence is Florida, and I've gone to school in Illinois, and I'm working with the Wilderness Study Group at CU, and the reason I came out here was really to see wilderness, because I haven't seen too much of it in my lifetime. A couple weeks ago I went out to Sewemup Mesa and I've never in my life seen anything that mildly compares to it at all. I think it's really just amazing landscape, and to see such sights really inspired me so much to live life and to appreciate and love the beauty around me, but I can't really appreciate it if it's not there, and I feel strongly that we can always go back to mining interests and to mining plans, but we just can't always go back to wilderness.

Wilderness is really what keeps me out here, and I think it is a rarity in the United States, and I'd really hate to

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see it torn up. There is such a difference in driving up Flagstaff to Flatirons, which border Boulder, and going out to a wilderness study area because in places like the Flatirons there's so much of humankind around--not that I have anything against humans, being of the same species, but just being in a WSA is a different world, and there's just canyons and valleys and mountain lions and bobcats and coyotes and deer and it's such a peaceful existence and it's really invigorating, and it's a silent world, and I think that's why we need to stand up and speak for them.

I'd like to mention that only one percent, from what I understand, of the BLM land in Colorado is proposed wilderness. One percent. That leaves 99% for other purposes, and I think, for heaven's sake, we should keep that much. It's really much too precious to lose. I think that we should think of these lands sort of as a bank for resources, and that in a national emergency we could always go back. An act of Congress could change the designation, and we could tap these resources, but I think we should just at least give one of us a chance, and the (unintelligible) wants to keep Black Ridge split up with a road, but this club could get their minerals in any of the areas in the remaining 99% of BLM land.

As has been mentioned before, these minerals are by no means unique to that area, and I don't think we should let greed overpower our sensibilities. Wilderness brings to me, and

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I know to many others, a sense of breathlessness to life and I think the magnificent grandeur is irreplaceable. Therefore, I urge you to reconsider your option to not recommend Palisade and Demaree and Little Bookcliffs Wild Horse area. Those wild horses need their habitat, and I wonder how any human would feel about being needlessly evicted from his home by an insensitive, domineering landlord, and I'm referring to mankind in general, not the BLM.

I think that one thing that sets us aside from the other nations in the world is our ability to decide what to do with our land, that we, as Americans, have a choice. I think that's a special privilege, and I think that we should make a choice that will last and that will promote recreation and health, not a boom and bust short-lived, but everlasting misuse.

Thank you.

PRESIDING OFFICER: Thank you. Are there any questions?

(No audible response.)

PRESIDING OFFICER: Thank you very much.

Was there anyone signed up who I had missed?

(No audible response.)

PRESIDING OFFICER: Okay, at this time are there any other speakers who would like to speak who are not signed up?

(No audible response.)

PRESIDING OFFICER: Seeing none, Rosalind, you may

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continue at this point; and please state your name again.

MS. ROSALIND McCLELLAN: My name is Ros McClellan. I live at 483 Marine in Boulder.

I appreciate this opportunity to say a few more words. I wouldn't want you to think you had wasted your time coming all this way, and I (unintelligible) and I also appreciate your coming to Denver and having the hearing here. I think that increasingly Denver and Grand Junction will become closer as more of us flee in our fast vehicles to find solitude in western parts of the state, so I think it's appropriate that you do hear from us.

I wanted to just sort of parenthetically remark on a phrase I found in the RMP. It's a little bit out of context and also, it doesn't exactly relate to the guidelines you were trying to follow (unintelligible) but I did notice that it says on page 128 that the importance of habitat is its contribution to scientific knowledge and human enjoyment, and there is another philosophy occasionally voiced which is that the environment's entire purpose isn't only to serve human ends, and that there is an intrinsic value in preserving nature. It has rights to existence, apart from our need for it, but I know that's not a view that's prevailing in any of the federal agencies yet.

I also would like to point out regarding wilderness, your wilderness recommendations that, although you have recommended a whopping 3/5 percent of your wilderness study

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acreage, which far exceeds any other resource area to date, in another sense it's more like, I guess, two-thirds of 50%, or whatever the original acreage was in the original inventory, which we would like to see included.

I'd like to strongly commend you in recommending Black Ridge and Dominguez, which are what I consider your flagship wilderness study areas in the state. I also strongly support your road closure for the road that divides the two halves of Black Ridge. I think it will make for a more integrated wilderness area and increase its management, and also improve the opportunities for solitude for the wilderness users.

I also appreciate your closing off (unintelligible) in Dominguez Canyon, which again oftentimes agencies don't have the courage of their convictions to do that. I'm concerned that you've blocked off 20,000 acres off Dominguez and I, again, whether it's because of a concern for access across private land or because you're second-guessing the Bureau of Reclamation and the possibility of a future dam, again, I would recommend more boldness, and again, the wilderness boundaries could be changed at a later date if you do have problems.

203

As I understand it, if you were to focus on controlling access to Dominguez and channeling visitors through specific areas, the problem of crossing private land could be diminished. Maybe that would be a way to avoid having to diminish so much, or cut off so much acreage.

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Palisade is an area that has tremendously strong wilderness values. I'm wondering whether, if you could change the boundaries so as to exclude the lower portions where there is a conflict with fuelwood gathering and ORV use, even though it would make for a very odd-looking boundary on the map, as I understand it--I haven't been there. I've seen it, but not been inside the WSA. The topography itself would make boundaries which would be manageable because of the strong cliffs below and above.

205

Very quickly, I wanted to just read a description of Palisade from a paper that Dick O'Donnell (phonetic) wrote, and if it's not in the hearing record already, I'd like to make sure it is in. He says that because of the (unintelligible) is unsymmetrical, being higher on the southwest side, where it is marked by a prominent faultline, the deepest portion of Unaweep Canyon lies near its southwest terminus. In this area, partially included within the wilderness study area, the canyon approaches 4,000 feet in depth, and high vertical walls of hard metamorphic rock line its sides. This great relief is the cause of the WSA's most outstanding feature (unintelligible). The elevation rises from 4500 feet to more than 9400. Rainfall ranges from much less than 10 inches to more than 30 inches per year. Plant and animal life also varies in accordance with this diversity. Few, if any parts of the United States can offer such a wide range of natural characteristics over such a small

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area.

So again, I would urge you to reconsider your non-wilderness recommendation for Palisade and consider whether a redrawing of the boundaries would make it manageable.

Little Bookcliffs and Demaree are the only wilderness areas remaining in the Bookcliffs. They have a tremendous importance for wildlife. There are a lot of prairie falcons, other wildlife. I'm concerned that you have made the assumption that the leases, the pre-FLPMA leases will, in fact, be developed even though, for example, in Little Bookcliffs, there are some abandoned wells in the southeast portion which indicate a low oil and gas potential, and also, many of the pre-FLPMA leases, as I understand it, are due to expire in November. Whether the lease holders will have the funds to maintain due diligence and keeping -- leases from expiring in this time of a very soft market on--and very little demand for oil and gas, I think is definitely open to question. And again, I think that you could tentatively recommend it for wilderness, and then with the idea that there'd be some kind of provision to see what, in fact, happens with the market.

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I guess those are my main comments. I'm very concerned that if, in fact, Demaree and Little Bookcliffs do have to be recommended for non-wilderness, that you have, nevertheless, opened them up for coal, and my forward comments would pertain. I think that it's unfortunate to foreclose

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irretrievable values for hypothetical future possible commodity needs.

So I guess that concludes my comments--oh, and I did want to say that visiting Sevenup Mesa recently, I thought you might want to apply a new designation to it, that you might want to designate it a BTM area, blow your mind area, and you also might want to install some drinking fountains and some benches. Thank you very much for the opportunity to comment.

PRESIDING OFFICER: Are there any questions from the panel?

(No audible response.)

PRESIDING OFFICER: Thank you, Ms. McClellan.

Are there any others who would like to speak at this time?

(No audible response.)

PRESIDING OFFICER: Seeing none, I want to remind you that the record will be open for written comment until July 3rd, 1985. We have the address: 764 Horison Drive, Grand Junction. If you wish to obtain a copy of this transcript, please speak to the recorder after the meeting is closed and make arrangements with him for a copy of the transcript.

This concludes this hearing at this time.

(Whereupon, the public hearing was concluded.)

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REPORTER'S TRANSCRIPT

GRAND JUNCTION RESOURCE MANAGEMENT PLAN
(PUBLIC MEETING NUMBER 3)
May 15, 1985

BE IT REMEMBERED, that on this, the 15th day of May, 1985, at the Delta Middle School, came on for hearing at 7:30 p.m., before Mr. Lee Carie, Oil Shale Project Manager, and before Julie A. Ward, Registered Professional Reporter and Notary Public in and for the State of Colorado, whereupon the following proceedings were had:

ORIGINAL

D

C E R T I F I C A T E

STATE OF COLORADO)
) ss.
COUNTY OF MONTROSE)

I, Julie A. Ward, Registered Professional Reporter, and Notary Public, State of Colorado, do hereby certify the facts as stated by me in the caption hereto are true; that the foregoing testimony, was made before me by the speakers hereinbefore named, and were thereafter reduced to typewriting by me and under my supervision; and that the same is a true and accurate transcript of my stenotype notes then and there taken.

I further certify that I am not employed by, related to nor of counsel for any of the parties herein nor otherwise interested in the outcome of this action.

In witness whereof, I have affixed my signature and seal this 24th day of May, 1985.

Julie A. Ward, RPR
P.O. Box 1184
Montrose, Colorado 81402-1184

My Commission expires: 1/2/89
JAW
job no. 85-122

1

DEPARTMENT OF THE AIR FORCE
AIR FORCE REGIONAL CIVIL ENGINEER CENTRAL REGION
1114 COMMERCE STREET
DALLAS, TEXAS 75242

18 April 1985

Mr. Forest Littrell
Bureau of Land Management
Grand Junction Resource Area
764 Horizon Drive
Grand Junction, Colorado 81506

Dear Mr. Littrell

Thank you for allowing us the opportunity to review the Draft Resource Management Plan/Environmental Impact Statement for the Grand Junction Resource Area, Colorado/Utah.

We continue to express our support of the BLM in developing functional management plans for lands under its control. The Air Force concern for these management issues contains the need to retain use of existing and the establishment of future military flight training areas and routes which may traverse these areas.

Currently no Air Force air operations traverse any portion of the study area. Although flight training areas, routes, and airspace requirements of the military are subject to change and do change frequently, it is not anticipated that new routes will be established in the immediate future.

We are hopeful this information is useful in your planning. If additional information is needed, our staff point of contact is Mr. Raymond Bruntmyer, (214) 767-2527, or FTS 729-2527.

Sincerely

JOHN MICHAEL BRADFORD, Capt, USAF
Director, Environmental Planning Div

Cy to: HQ USAF/LEEV

2

6391 E. Printer Udall
Tucson, AZ 85710

85 APR 29 PM 1:40

April 24, 1985

Forest Littrell
Bureau of Land Management
Grand Junction Resource Area
764 Horizon Drive
Grand Junction, CO 81506

Resource Management Plan
March 1985

Dear Mr. Littrell:

Upon first reading, this report seems to be thorough, but an analysis leads me to ask several questions about the treatment of locatable minerals in the areas to be recommended for wilderness designation. The first, with others clarifying it, has to do with the evidence for declaring a given area to have low mineral potential. The second has to do with the necessity for wilderness designation for any area.

215 Why were the four areas recommended for wilderness designation rated as having low mineral potential? Did the USGS or the Bureau of Mines study the areas? I thought Congress had mandated such a study. Was your rating based upon the fact of few unpatented claims? You should note that metal and mineral prices have been depressed for several years, and the WSA designations strongly discourage mineral exploration. The fact of few claims should weigh lightly as evidence of low mineral potential. A large number of areas dismissed in the past as non-mineral have been mined with success in subsequent years. The copper porphyries of southern Arizona and the gold mines of northeastern Nevada are stellar examples of such areas.

216 Why do you need wilderness designations? Your Chapter 5 certainly shows your powers under FLPMA to control an area completely. You are able to maintain the values of solitude that are cherished, but, at the same time, maintain the flexibility to change to multiple use if dire scarcity of some natural resource were to arise. Congressional authority to withdraw wilderness designation might be too slow--BLM could change its rules very quickly.

Thank you for the opportunity to comment upon your Resource Management Plan. Although extremely repetitious, it is informative.

Sincerely yours,

J. M. Cunningham

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THIS LETTER HAS BEEN REPRODUCED

4-30-85

Frosty Littrell
BLM
764 Horizon Drive
Grand Junction, Co 81504

Dear Mr. Littrell,

I would like to voice my support for your WSA boundaries for the Black Ridge Canyons area. I wholeheartedly support the closure of the roads in that area.

203 I am, however, disappointed by the fact that not all of the Demaniuex Canyons WSA was recommended. Please reconsider the areas along the Gunnison River and Escalante Creek. Why stop short of a complete recommendation of this remarkable area?

177 I support your recomendation for the Sewemup Mesa area, but wish the Dolores River itself was protected under the Wild & Scenic status.

217 I am very disappointed that the Palisade, Little Bookcliffs and Demiree Canyon areas were not recommended. How could this be? These unique areas should not be lost to unbridled off road vehicle use and oil/gas leasing. You have recommended that the ENTIRE Bookcliffs region be available for mineral leasing. Of these 380,000 acres surely a more balanced approach would be to recommend the relatively small 80,000 acres of The Palisade Demaree Canyon and Little Bookcliffs as roadless wilderness.

As a long time resident of the Grand Junction area I've often enjoyed visiting all of these areas. Yes, I do own a 4WD, but I have found that there is already an excessive amount of 4WD roads/areas. I would rather drive to the edge of these places and walk in and enjoy these places as they should be enjoyed - on foot. We have so little time left to protect what small areas still exist for our children. Please reconsider some of your suggestions. Remember these wilderness decisions are forever. I am deeply thankful that others who came before us had the foresight to protect the places that we now enjoy.

Thank you for your time and consideration of my opinion.

Sincerely,

/s/ Bob Ratcliffe

Bob Ratcliffe
1222 White Ave
Grand Junction, Co 81501

cc: Rep. Strang, Sen. Hart, Sen. Armstrong

4

May 6, 1985

Dear Mr. Littrell,

After a recent visit to Sewemup Mesa, I have found that particular WSA to be a truly spectacular and fragile area. Because I walked several miles over the diverse, semi-desert terrain, I can attest that the environment's sandstone and pine forest offerings provide an excellent opportunity for solitude and a primitive form of recreation. I believe that wilderness designation for that area is a practical necessity for several reasons.

First of all, the wealth of wildlife that inhabits the area is a real treasure. While hiking through Garvey Gulch, we identified fresh mountain lion tracks and deer, coyote, and bobcat tracks as well. The rocky terrain, extensive cover, climate, and food supply all donate to the fact that these species are surviving undisturbed and interacting naturally with one another. This is encouraging in view of the sad state that our wildlife is in. Also, the endangered but recovering Peregrine Falcon maintains a roost within the Sewemup Mesa boundary and it is apparently prime habitat for this raptor. Following through with oil and gas development or mining would seriously impair the Peregrine's habitat and hunting area which the canyons provide.

Next, because no road exists in the area, Sewemup is a beautiful example of wild land. The contraversial "road" that leads up to a plateau is an excellent hiking trail but is unsuitable for any motor vehicle because of the extreme roughness of the route. It is actually impassable in several areas, except for foot traffic. Also, Roc Creek Canyon is absolutely unmatched. The splendor of the canyon one senses while looking down at the stream is almost metaphysical. The entire canyon environment is a pristine example of a beau-

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tiful relationship between the trees, cliffs, river, and wildlife--a real wilderness setting. Maintenance of that relationship is important to those who view the area from some clifftop.

The geology of the mesas is also fragile and worthy of protection. The diverse sandstone layers, aeolian and aquatic deposits laid down over eons, provide a real geologic education and chronicle the history of the area. The beautiful colors of the sandstone stratas are the backbone of the area and are irreplaceable.

All this considered, I believe it is imperative to preserve the Sevenup Mesa as BLM wilderness. The rich resource it provides for the state has been established for millions of years. It is now up to the BLM to see that it remains pristine for just as much longer.

Sincerely,

Jill Janine Smith

5

Mesa County Parks

634 Main Street, Suite #3
Grand Junction, Colorado
81501-2708

(303) 244-1710

RECEIVED
85 MAY 8 MAY 7 1985

Wright Sheldon
Bureau of Land Management, District Office
764 Horizon Drive
Grand Junction, CO 81506

Dear Mr. Sheldon:

I have just reviewed the Grand Junction Resource Area RMP/EIS, with regard to the impacts upon the recreational, wilderness and visual resources within Mesa County. The RMP is very well researched and documented, almost to a fault, but none-the-less necessary.

It makes the fact clear that the Pre-FLPMA Oil and Gas leases preclude any management decisions involving the above mentioned resources. This is most unfortunate for the general public.

With this in mind, the Preferred Alternative is just that. Thank you for this opportunity.

Sincerely,

Robert E. Myers
Director

REM/sej

cc: Ken Glover
Bennett Boeschenstein

6

Bureau of Land Management
[illegible]

Dear Sirs:

I understand written testimony is to be [illegible]
the Book Cliffs Wilderness Study Area, I would like to [illegible]
and Resource Management Plan.

I believe the people deserve [illegible]
wilderness quality areas should indeed
be protected as wilderness [illegible].

Some portions of the republic may fear that their activities, such as grazing, are to curtail. Rather, I would [illegible]
protected by wilderness designation by prohibiting [illegible]
types of development, of course, [illegible]
would have to be [illegible].

[illegible] the north of the Dolores River, and [illegible]
[illegible] together with the "Colorado Segment" [illegible]
[illegible]
through [illegible] way for a foot path through [illegible]
to hike [illegible]. In every case, it was done [illegible]
and I [illegible]
the edge to the [illegible]. If the [illegible]
[illegible]. I will [illegible]
to the [illegible].

Yours truly,

[illegible]

7

THIS LETTER HAS BEEN REPRODUCED

3590 Berkley Ave.
Boulder, CO 80303
May 12, 1985

Frosty Littrell
Bureau of Land Management
764 Horizon Drive
Grand Junction 81506

217 177

Please include this letter in the public hearing record for the BLM draft Grand Junction Resource Management Plan. The six wilderness study areas covered in this plan all have excellent wilderness characteristics and should all be designated Wilderness Areas. The deletion of Little Bookcliffs Wildhorse area and Demaree Canyon in BLM's Preferred Alternative plan is unfortunate. The value of oil and gas leasing in these areas does not, in my opinion, outway the value of habitat preservation for such animals as bear and mountain lions. These last two remaining roadless areas in the Bookcliffs should be protected, even if the remainder of this vast region is exploited for minerals. Wilderness designation for The Palisade WSA, which is an area of incomperable beauty as well as remarkable ecological diversity, is even more crucial. Though off-road vehicles threaten the area, The Palisade certainly merits all efforts to keep these vehicles out. There are plenty of other areas nearby for use by off-road vehicles. In addition to the above comments, I must also urge the BLM to protect the Dolores River from mineral development, as it has been recommended for Wild and Scenic status.

Sincerely,

/s/ Andrew McConkey

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MUSSER RANCHES

701 650 Escalante
Delta, Colorado 81416

Telephone (303) 874-7372

May 11, 1985

Mr. Forest Littrell, Area Manager
Bureau of Land Management
Grand Junction Resource Area
764 Horison Drive
Grand Junction, Colo. 81506

Dear Mr. Littrell:

After studying the Grand Junction Resource Area Management Plan Draft of March, 1985, we would like to make the following comments.

218 We feel you have been quite thorough in your study on the impact of plants, animals, fish, vegetation, etc. However, there is nothing in your plan that addresses the impact on our business, property, and personnel, especially in the proposed Domingues Wilderness Area.

We are sure you are aware of the fact that the Musser ranch is one of the largest in Western Colorado and owns 90% of the private land for approximately 35 miles adjacent to the proposed wilderness on the eastern and southern boundaries. The problems we have now and in the past have increased steadily over the recent years with the influx of more recreationists. We feel that a nationally advertised wilderness area would make these situations even more critical. There are no proposed trails on these boundaries that do not cross Musser land for access or egress. Consider us running our cattle through your business office to get to the grass on the other side of your building.

We will take this opportunity to point out some of the problems we as businessman and residents face due to public impact. These problems are present throughout our ranch operation, and are critical in areas such as the main ranch, Escalante Forks, and the Bridgeport Ranch. There are numerous other problems we are not addressing at this time due to the length of this letter.

8

Trash

The B.L.M. provides no facilities for public trash. We are constantly picking up bottles, cans, boards with nails, etc. This is not only an eye sore, but proposes dangerous hazards to our livestock. I am sure if we were to throw trash all over someones yard in the city, we would end up in jail. Try to look at our property as a big yard that we are very proud of.

Gates

On numerous occasions, the gates are left open by hikers and campers. Not only on our drift fences in the permit areas, but also on our private lands. This allows our cattle and horses to go into areas where they are not supposed to be and takes tremendous amounts of our time to recover our livestock once it is loose in rough terrain. It also necessitates them being corralled and divided into the proper herds. Some means must be implemented to solve this problem.

Fences

Our fences are constantly being torn down and cut by public recreationists to gain access across areas controlled by fences, mostly by four wheel drive owners who are too lazy to walk to where they want to be, or to take a short cut. In many areas, we use brush fences. These are frequently set on fire and several miles of fence destroyed. This is very time consuming and expensive to replace.

Vandalism

Most all our properties are vandalized by recreationists. In many instances, our personnel are required to move around to different housing locations to work areas that are used at different times of the year. While they are gone, their personal property and our vehicles, buildings, and equipment are vandalized and destroyed. The Musser ranch consists of thirteen seperate housing units strung out over approximately 47 miles. Six of these are left unguarded at times. We have had houses burned, corrals and gates and bridges used for firewood. Just last weekend, the house at Escalante Forks was broken into and completely ransacked. We are still trying to assess what was stolen and the amount of damages.

8

Theft

One of the largest problems is theft. We have had complete housing units totally emptied of furniture, stoves, tools, etc. In some cases, thieves have even used our own tractors and wagons to haul our equipment off. Many items were family heirlooms and antiques that can never be replaced.

Irrigation Ditches

We are constantly having problems in the summer months with the public tampering with our irrigation controls. They open headgates and wash out ditch banks. They dam up our ditches and flood and wash out our roads. They dump trash and bottles and cans in our ditches. In many areas, these ditches are our domestic water supply. This poses a health hazard.

Roads

Most of the roads are unimproved dirt B.L.M. and County roads, which are not maintained regularly. When wet, they are cut to ribbons by four wheel drive vehicles. In the Bridgeport area, the road is graded only once a year and at times, is impassable due to heavy traffic by hikers and recreationist vehicles after a heavy rain. Of course, when they get stuck, we are the ones they come to for help and to get pulled out or taken to town. Remember, there are no phones or electricity at many of our locations.

Public Aid Stations

Contrary to many people's beliefs, we are not a public aid or ranger station. People are always in trouble, mostly due to their own stupidity, and expect us to drop everything and help them. We are plagued with people who get stuck, break legs and arms, want to use the phone, are out of gas, have a leaky raft or boat, have a broken down vehicle, are lost, etc. In most cases, after they are assisted, they don't even thank us for helping them, let alone reimburse us for the gas or wear and tear on equipment or time lost, which is money to us.

Bridgeport Ranch

One of the areas most affected by the public and the proposed wilderness area is the Bridgeport Ranch. It has been the source of theft, vandalism, murders, reckless gunfire, burnt

8

Bridgeport Ranch (cont.)

houses, fences, corrals, harrassment and many more problems. Due to it's remote location close to Grand Junction, it is necessary to have security personnel living there to protect it and the bridge from the public.

This is the area you are planning to use for the main and only year round access into the proposed Domingues Wilderness. We do not understand how you can propose to use our private bridge for this purpose. Even though we allow local foot traffic to cross the bridge, the question of public liability has never been settled and the bridge is maintained totally by Musser ranches and private parties who use it for access to their homes and grazing permit areas. We do not understand how you can expect us to provide a bridge crossing to the public for a nationally advertised wilderness area. The bridge was condemned for public use by the State in 1935. In 1974, the B.L.M., thinking the bridge was public property, decided the bridge was unsafe and should be torn down to protect the public from possible injury. Only after a legal battle, with Musser ranches proving the bridge was their private property, was it left intact and the B.L.M. washed it's hands of any responsibility. The bridge is in a very unsafe condition with many rotten understructure planks. The side rails are in very poor condition and if someone were injured or killed on the bridge, we would surely be sued for damages.

In 1983, the problem again arose after much serious vandalism. At that time, we realized the law enforcement situation was totally inadequate to handle any problems. The local authorities do not even know where Bridgeport or the Escalante Forks ranches are. At this time, we requested permission from the County to close the road .7 mile bafore the bridge to protect it. This request was granted. However, after a break-in by a B.L.M. official (on a personal cutting), it came to light the road was controlled by the B.L.M. and after much negotiation, we agreed to allow local foot traffic to cross the bridge in exchange for the road closure to protect our private property. Now the B.L.M. is proposing to use this private bridge, which it has tried several times to dispose of as a public hazard, as the main trailhead and only year round access into the proposed Domingues Wilderness. This makes no sense to us. Is it legal for the government to direct the public on a trailhead across a private, condemned bridge and not accept the liability for accidents to the public?

8

Mr. Forest Littrell
May 11, 1985
Page 5

Bridgeport Ranch (cont.)

We do not feel comfortable with this situation and we are sure you do not either. This is a very critical problem. With increased public traffic comes increased risk. We cannot put ourselves in the position of being liable for the public in any way. If this is the plan you are proposing to use for the next 20 years, it is doubtful the bridge will last that long, especially with increased public pressure. The question of liability must be solved for the present conditions, regardless of future plans.

Enforcement

To our knowledge, you do not have any provisions to patrol or enforce the regulations of a wilderness in this area. Our properties cover three counties and we are not equipped or authorized to enforce any violations that occur. In other words, if someone breaks the law, we are defenseless and are the ones who pay for the losses. We believe, and it has been documented, that we and other ranchers lose numerous animals to rustlers and poachers who kill and butcher our livestock while they are grazing on public and private lands. Very few are ever caught, due to the lack of law enforcement on public lands and in wilderness areas.

Criminal Aspect

Remote areas, such as wilderness areas, draw fugitives and people hiding from the law. Just recently, the F.B.I. was searching the Dominguez Canyon area for heavily armed and desperate criminals. On several occasions, escaped criminals have approached our ranches. We do not feel particularly safe under these conditions.

Preserving A Wilderness

We feel this area was a real wilderness until it was advertised as a wilderness study area. Since that time, numerous unimproved four wheel drive roads have been started, impacting the area to a great extent.

Our feeling is that this semi-arrid area cannot withstand the human impact of being a nationally advertised wilderness area, inviting in many irresponsible people. If you want to protect a wilderness, don't advertise that it is there.

8

Mr. Forest Littrell
May 11, 1985
Page 6

Trespass

People freely trespass on our land without permission and usually argue and become hostile when asked to leave. This is critical during hunting season while we are trying to protect our livestock and everyone is carrying firearms. Most all of our buildings and signs are scarred with bullet holes. These trespassers know the odds of being caught and punished are slight, especially out-of-state people.

In conclusion, after taking the above problems into consideration, we have to say we feel the proposed Dominguez Wilderness is totally unsatisfactory, unless these problems can be dealt with in an affective manner.

We have been in business and lived here for over 100 years and have cooperated with the B.L.M. for as many years as it has existed. We have tried to absorb the numerous and constantly changing rules, regulations and hardships imposed on us by public agencies. However, we feel if we are to survive, we must protest this current plan. We can absorb no more public impact.

We sincerely appreciate this opportunity to voice our concerns and will look forward to your response to solving these problems we have brought to your attention.

Sincerely,

The Musser Ranch

Jack Musser

John Musser

Tom Musser

cc: Bob Moore
Cecil Roberts
Eric Finstick
Larry Porter
Dick Freel
Barry Cushing
Wade Johnson
Rich Arcand
Carlos Sauvage

9

THIS LETTER HAS BEEN REPRODUCED

May 17, 1985

Dear Mr. Littrell:

Thank you for adopting many of the points that conservationists everywhere suggested in your "Protection Alternative" RMP.

It is heartening to have these important protections for wilderness and wildlife put into the Resource Plan.

203 I would hope that more of the Dominguez Canyons could be included for protection, as there is so much archeological heritage in those areas along the Gunnison and Escalante Creek.

But I know more about the Palisdae acreage. It is terrific wilderness--one of the best in the state, I understand--and so very beautiful. Hopefully, it could be managed as wilderness and the present vehicle use kept to a minimum.

Also, Little Bookcliffs has been studied by a number of Boulder wilderness enthusiasts and I intend to make a trip there this spring. Please recommend wilderness for this marvelous place.

204 I realize that you must keep many interest "happy" and it is not an easy job, but I sincerely feel that Colorado has more at stake for the state's future in wilderness than in all the deplotable oil and gas reserves we could possibly muster.

Thanks again for all the hard work on the part of you and your staff.

Sincerely,

/s/ Wina Johnson, 747 12th, Boulder, CO 80302

10

THIS LETTER HAS BEEN REPRODUCED

Haverhill, Mass.
May 18, 1985

Area Manager,
BLM,
764 Horizon Drive,
Grand Junction, Colorado 81506

Dear Area Manager:

In reference to a 20-year draft resource management plan for Garfield, Mesa and Delta Counties I hereby recommend:

(1) Four new wilderness areas,

2. Reduction of salinity from Grand Valley

27 3. I oppose development of 350, acres of the Little Bookcliffs for coal mining

Sincerely

/s/ John M. Chaplick

Activist Sierra Club

John M. Chaplick
160 Main St., Apt. 702
Haverhill, MA 01830

11

THIS LETTER HAS BEEN REPRODUCED

5-21-1985
Clifton CO

Forest Littrell
BLM

Dear Sir

I am writing concerning possible closing of desert recreation area for off road vehicles.

I have been using this area for about twenty years for off road riding.

I have children age 17 and twins 5 years old who are also riding.

192 | I believe a smaller area would lead to accidents because of a more crowed area and also more dange to the land.

Sincerely

Age 38 /s/ Marvin Brown
3268 "E" Road #80
Clifton CO 81520

12

180 | I would like to see the Rattlesnake Canyon area designated as wilderness. I have hiked in the canyon and enjoyed the beauty of the area. I would like to see it preserved for future generations.

217 | I would like to see the Rattlesnake Canyon area designated as wilderness. I have hiked in the canyon and enjoyed the beauty of the area. I would like to see it preserved for future generations.

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217 | I would like to see the Rattlesnake Canyon area designated as wilderness. I have hiked in the canyon and enjoyed the beauty of the area. I would like to see it preserved for future generations.

13

JOHN P. FEARL
607 SHERIDAN ST
KAUKAUNA, WI 54130

May 23, 1985

Bureau of Land Management
GRAND JUNCTION RESOURCE AREA
764 HORIZON DR.
GRAND JUNCTION, CO 81506

DEAR BLM,

I have recently learned that your draft management plan recommended wilderness designation for the area I know as Rattlesnake Canyon (also called Black Ridge). I whole heartedly support wilderness designation for this area. Fortunately, I had the opportunity to hike the full length of the canyon this spring and stood in the shadows of the incredible arches and amphitheaters it boasts. The arches are an outstanding feature of this area, and therefore the boundaries of the wilderness designation should include all of the arches in this area. Also to protect this fragile environment from over-use I would recommend and support the closing of the existing jeep trail. Rattlesnake Canyon was the most wild, scenic and unspoiled area I have seen out West and I believe that it is of utmost importance to preserve its beauty and it arches in their existing state for the generations which will follow us. Please include this letter as part of the official record of the Resource Management Plan. Sincerely, John P. Fearl

208 | I would like to see the Rattlesnake Canyon area designated as wilderness. I have hiked in the canyon and enjoyed the beauty of the area. I would like to see it preserved for future generations.

14

Martha Nesbitt
908 Alpine #5
Boulder, CO 80302
June 1, 1985

Frosty Lithrell, Area Manager
Bureau of Land Management
764 Horizon Dr.
Grand Junction, CO 81506

Dear Mr. Lithrell,

I would like to comment on the proposed Grand Junction draft RMP. I have done extensive hiking and camping in the desert canyonlands of Colorado and feel strongly that the proposed areas are unique and must be protected. I support the Protection Alternative and I am particularly interested in the following issues and areas.

203 The BLM has only recommended 56,315 of 78,935 acres for wilderness in the Dominguez Canyons. This area contains abundant archeological sites, mountain lions, bears, desert bighorns etc. I oppose the deletion of the 20,000 acres along the Gunnison River and Escalante Creek to prevent trespass onto adjacent areas. These are areas already traditionally used by the public and trespass will or will not occur regardless of wilderness designation.

14

203 The boundaries suggested by BLM for the Black Ridge Canyons are excellent. I also support BLM's recommendation for essentially all of 15000 acres of Sewemup Mesa which is an isolated and beautiful (ungrazed) mesa.

Three areas have not been recommended for wilderness which, I believe, deserve to be protected. The Palisade, Little Bookcliffs Wilderness Area, and the Demaree Canyon should be given a wilderness designation. The Palisade contains a variety of ecosystems including 205 ponderosa pine bordered by streams in Unaweep Canyon and tawny sandstone cliffs along the Dolores River. BLM's concern about snowmobiling, off-road vehicle use should not outweigh the value of preserving this interesting wilderness area. Also the Little Bookcliffs Wilderness Area and Demaree Canyon outside of Grand Junction are the last two remaining roadless areas in the Bookcliffs and Gold 204 wild horses, bear, mountain lion & wintering deer. The entire Bookcliffs area with it's 70 is being sacrificed to mineral development and thus I would like BLM to at least protect a small fraction of that

14

area by designating the Demaree Canyon & Little Bookcliffs roadless area as wilderness. 204 I support BLM's proposal to designate Six Research Natural areas which include the Fruita & Rabbit Valley paleontology sites, Pyramid Rock and Rough Canyon for endangered plant species, Unaweep seep for rare butterflies, and Gunnison Gravels for geological study.

Finally, I support the withdrawal of mineral development from the Colorado River corridor in Ruby & Horsethief Canyons. I have rafted through those areas and hiked back into the canyons which contain magnificent arches and cathedrals of rock. I also encourage the BLM to give the same protection for the 177 Dolores River downstream from Gateway which is also proposed for Wild and Scenic status.

I hope you will do your best to preserve these magnificent areas so that our children may enjoy them as we have.

Kind Regards
Martha Nesbitt

15

June 6, 1985

Bureau of Land Management
Grand Junction Resource Area

I would like to take this opportunity to respond to the Grand Junction RMP. I have been working in the recreation industry for about eight years. Most of my experience has been in commercial rafting.

My comments tend toward protection because I believe that public lands yield greater returns if they are managed for recreation. Often lands are withdrawn from wilderness consideration because of mineral possibilities (or other commodities). This makes little sense to me. Mineral extraction yields financial rewards for a limited time to a few individuals whereas tourism yields greater monetary returns and benefits greater number of people.

177 Ruby Canyon should have a scenic designation and withdrawn from mineral entry. Permits should

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181 not be required for private boating. Fish stock should be kept out of the river corridor.

The combination of Black Ridge wsa and Ruby Canyon offers outstanding opportunities for river sports along with great back country hiking. Ruby Canyon has all the characteristics of a wilderness river and should be protected as such.

177 The Gunnison and Dolores River Canyons deserve protection also.

All of the wsa's should be designated wilderness. In addition 2 Salient

219 Granite Creek should be reconsidered.

Sincerely

Stan Ferris

16

Shell Minerals Corporation

P.O. Box 2906
Houston, TX 77252

Jack L. Mahaffey
President

June 10, 1985

Mr. Forest Littrell
Area Manager
Grand Junction Resource Area
Bureau of Land Management
764 Horizon Drive
Grand Junction, Colorado 81506

Dear Mr. Littrell:

SUBJECT: COMMENTS ON DRAFT RMP/EIS FOR GRAND JUNCTION RESOURCE AREA

Shell Minerals Corporation supports the general thrust of the Preferred Alternative that is described in the Draft RMP/EIS for the Grand Junction Resource Area. However, we have some suggestions for enhancing the effectiveness of the Draft RMP/EIS---in particular, those portions of the Draft RMP/EIS that deal with the disposal of isolated tracts of federal land. Our suggestions are presented below.

- Need for clarification in the Preferred Alternative that exchanges will be used as the primary mechanism for disposing of isolated tracts of federal land.

249 The Draft RMP/EIS's summarization of the Preferred Alternative states very clearly that the BLM will attempt to use land exchanges as the primary mechanism for disposing of isolated tracts of federal land in the Grand Junction Resource Area (see page 8 of Draft RMP/EIS). We strongly support the BLM's proposed emphasis of land exchanges. However, in the interest of clarity, we suggest that BLM reiterate its intent to emphasize exchanges by including language to that effect in the Draft RMP/EIS's detailed discussion of land disposals under the Preferred Alternative, specifically pages 105 and 106.

The language found in the third paragraph of page 8 of the Draft RMP/EIS could be used as the model for the language that we are proposing for inclusion on pages 105 and/or 106.

- Need for discussion of Shell Minerals' preliminary land exchange proposal.

250 We suggest that a brief description of Shell Minerals' preliminary land exchange proposal be placed on page 137 of the Draft RMP/EIS. We realize that our exchange proposal has not yet been formalized pursuant to the requirements of 43CFR 2201.2. However, we have every intention of submitting such a formal exchange proposal once our "offered" [illegible] package can be solidified. Shell Minerals' preliminary land exchange proposal was described in a letter to you dated May 9, 1984.

NS8514101

16

- Need to classify isolated split estate parcels of federal mineral estate that are overlain by private surface as "disposal tracts" in the Preferred Alternative.

We strongly support BLM's proposal in the Preferred Alternative to dispose of isolated parcels of federal land. However, the Preferred Alternative should be amended to include as "disposal tracts" those

251 isolated split estate parcels that have a federal mineral estate overlain by a private surface estate.

An example of an isolated split estate parcel, as referred to above, exists adjacent to Disposal Tract No. 150 as depicted on Map 5 of the Draft RMP/EIS. Specifically, Shell Minerals owns 280 acres of surface and all minerals, except the oil shale and oil/gas estates which are owned by the BLM, on a parcel of land adjacent to BLM's proposed Disposal Tract No. 180. Shell Minerals' 280-acre parcel is located contiguous to the northern boundary of Disposal Tract No. 150 in the NE¼, E½NW¼, and NW¼NW¼ of Section 14 of T7S, R97W. We strongly recommend that Disposal Tract No. 150 be expanded to include the federal mineral (oil shale and oil/gas) estate beneath Shell Minerals' above-described 280-acre parcel.

As a related item, BLM's proposed Disposal Tract No. 150 should probably be expanded to include a parcel containing about 28 acres of federal land

252 in the NW¼ of Section 23, T7S, R97W. Our records indicate that the subject 28-acre federal parcel is contiguous to the southern boundary of Disposal Tract No. 150, and therefore we believe inclusion of the 28-acre parcel within Disposal Tract No. 150 would be in the public interest.

- Need to describe in a general manner the procedures that the BLM will use to determine if a land exchange proposal is in the public interest.

We specifically suggest that BLM use the Draft RMP/EIS as a forum for outlining the procedures it will use to evaluate exchange proposals

253 involving the "selection" of isolated tracts of federal oil shale land on the southern rim of the Piceance Basin.

The Draft RMP/EIS should clearly recognize that oil shale exists on at least 7 of the 155 tracts that are identified as "disposal tracts" in the Preferred Alternative. Because oil shale exists on some of the "disposal tracts", language should be placed in the Draft RMP/EIS to emphasize that the evaluation techniques described in 43CFR 2201.3(c) may have to be used on certain occasions instead of the standard appraisal techniques described in 43CFR 2201.3(b).

254 Also, we suggest that the Draft RMP/EIS be amended to include language that recognizes the likelihood of tracts of private oil shale land located within the boundaries of the BLM's White River Resource Area of the Craig District being offered in exchange for oil shale-bearing "disposal tracts" located within the boundaries of the BLM's Grand Junction Resource Area.

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In conclusion, we commend you and the rest of your staff on the preparation of a well-balanced and workable plan for managing the multitude of natural resources in the Grand Junction Resource Area. However, we hope the BLM will use the suggestions presented in this letter to increase the workability of the RMP. As a final matter of interest, we believe the readability and clarity of the Draft RMP/EIS was enhanced significantly by the use of a land ownership map as the "base" map for depicting the various resource management alternatives.

Please feel free to call Kenny Schmidt (713-870-2840) if you or your staff wish to discuss in more detail our suggestions for improving the Draft RMP/EIS.

Sincerely,

Jack L. Mahaffey

KJS:CC

17

2040 Barberry Avenue
Grand Junction CO 81506
June 15, 1985

Forest Littrell
Bureau of Land Management
Grand Junction Resource Area
764 Horizon Drive
Grand Junction, CO 81506

Dear Mr. Littrell:

I enjoyed meeting you at the May 13 hearing, and I appreciate the opportunity to submit written testimony. First, I would like to compliment the BLM on the work they have done in preparing the resource-management plan.

In general, I support the Management Alternative recommended by the BLM. However, I do have some comments and alternative recommendations on some of the areas.

Disposal of BLM Land Except in rare cases I tend to oppose the transfer of public land to private ownership. In this particular
256 instance, I especially object to the disposal of river-bottom land along the Colorado River and land in Unaweep Canyon.

Dominguez WSA I have spent a fair amount of time in the Dominguez
203 WSA, and agree that it should be Wilderness. I don't see the need for the non-wilderness "buffer zone" between wilderness and private land. I particularly think that increased trespass related to wilderness is an invalid issue, and recommend that the nearly 20,000 acres that were deleted be restored in the final recommendation.

Black Ridge WSA I am not very familiar with this area, and listened with interest to the comments of the members of the Gem and Mineral Club. I'm not unsympathetic to their point of view; on the other hand, the continued exploitation of fossil and mineralogical resources by 4WD must eventually reduce the quality of non-consumptive use of the area. On the balance, I favor the BLM Recommended Alternative.

The ORV Problem Even the most casual observation of the arid lands in the Grand Junction Resource Area reveals the damage done by uncontrolled ORV use. I own a 4WD vehicle, but restrict its use to well-established 4WD roads, and deplore the "pioneering" of new ORV tracks. Thus I heartily endorse the proposal to restrict ORV use to designated areas and roads.

Gun Club Lease for Shooting Range Inasmuch as the Gun Club seems
174 to have been dispossessed of its lease by the Recommended Alternative, the final plan should either restore it or provide for an alternative site.

Access to Public Lands At the hearing, a hunter voiced his

17

frustration at being denied access across private land to public land. This is a serious problem in the GJRA and elsewhere in Colorado. Vast tracts of public land are essentially off limits to the public because they are virtually surrounded by private land. In some cases the owners of grazing permits regard such public lands as their own. This attitude was typified by the rancher from Delta who objected to the Dominguez Wilderness, and said that since he owned most of the access he didn't "see how you're going to get your recreationists in". This seems to me a selfish, hostile, and indefensible attitude toward the public's use of its own land. As a remedy, I suggest the following: holders of grazing permits on public land, and whose own land blocks access to that or other public land, should be required, as a condition of
288 holding a grazing permit, to allow access to the public land. This could be accomplished by the BLM's obtaining easements at specific points. The BLM could compensate the landowner for the easement by payment in proportion to the value of his grazing permit, or by having his grazing fees commensurately reduced. If desired by the landowner, persons using the access easement could be required to register with him.

Sincerely,

John Trammell

John Trammell

18

THIS LETTER HAS BEEN REPRODUCED

June 18, 1985

Dear Mr. Littrel,

I'm writing regarding the Wilderness Study Areas of Black Ridge, Black Ridge West, Dominguez Canyons, Sawmup Mesa, the Palisade, Little Bookcliffs and Demaree Canyon.

The 250,000 acres which include the above areas, must be designated as Wilderness.

These virtually pristine semi-primitive lands are home to bear, mountain lion, deer and wild horses, and are some of the most ecologically diverse areas in the state.

I personally enjoy the areas, as a place I can go to quietly observe sandstone cliffs and canyons, the streams and creeks, and wildlife, without listening to the roar of traffic, machines or other disturbing noises (which would be prevalent if industry was allowed into the area.)

217 Please consider the full 250,000 acres for wilderness designation, specifically The Palisade, Little Bookcliffs and Demaree Canyon.

Sincerely,

/s/ M. S. Caton
Denver, CO

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THIS LETTER HAS BEEN REPRODUCED

James Massano
Delta Colo
81416
6-15-85

Dear Sir.

I seldom write a letter of protest but in this case I believe I am right in
220 doing so. I hear rumors that you people want the public to cross the swinging bridge and Bridgeport and I want to protest for serval reasons one is that we been prospecting in Dominguez Canyon for about 30 years and we have had to get a key and be responsible for any damage we done and we are part of the public, we staked our claim and pd taxes on them. We have to keep close watch on tools and Dynimite as it is because of hikers and to have the public turned loose there will be more vandalism and damage and no responsitaly from the public, you have restricted us to limited mining so that nothing would be destroyed such as animals Indian writing bridge plank railing. I do not feel that I should have to maintain bridges and roads for public use and I will not be responsable for the public and restricted by them this maybe just a rumor because I have never been informed offially by any one.

If this is true I want on record as a taxpaying protestor (we will want the public to not interfear with our mining in any way and we will not be liabole for the public.

This bridge was never made for the public it was made for the rancher's stockment, and mining, the railroad was the only heavy transportation as there were no road's to the bridge.

Thank you

As Ever

/s/ James Massano
634 G. 75 Lane
/s/ Albert Massano
614 G 25 Lane
Delta, Co.

20

THIS LETTER HAS BEEN REPRODUCED

Frosty Littrell, Area Manager
Bureau of Land Management
764 Horizon Drive
Grand Junction, Co. 81506

17 June 1985

Dear Mr. Littrell,

This letter is written in regard to the BLM draft Grand Junction Resource Management Plan containing certain wilderness recommendations. Unfortunately I have not read the RMP, and would be pleased if you could send me a copy. But from what I have heard it sounds many aspects of the RMP are very commendable.

To begin with, I want to say I support the Protection Alternative in the RMP. The recommended boundaries for Black Ridge Canyons are quite good, as is the recommendation for Dominguez Canyons, yet I must strongly oppose the 20,000
203 acre deletion to try to prevent trespassing. As we know, those who trespass will do so no matter what, so please reconsider this deletion.

I also wish to support the recommendation for wilderness of all 18,000 acres of Sewemup Mesa. And I wish to encourage you to manage the 26,000 acre The
217 Palisade for wilderness. I oppose your not recommending wilderness in favor of oil, gas and coal leasing in the Little Bookcliffs Wild Horse Area. And also I stress my opposition to your lack of wilderness recommendation in the 25,000 acre Demaree Canyon. Please reconsider your support of oil and gas leasing, at the expense of wilderness.

A few more items to mention include the Northeast Creek in Unaweep Canyon, I
180 encourage you to manage this as other semiprivate non-motorized recreation areas. And I urge you to fully protect the Dolores by withdrawing it from mineral development, as was done with Ruby and Horsethief Canyons west of
177 Grand Junction. You also have my support in proposing to designate six Research Natural Areas.

One last thing, please take a balanced approach with management concerning The Bookcliffs. Consider protecting a small bit of the area by designating Demaree Canyon and Little Bookcliffs roadless areas as wilderness.

Thank you for your time.

Sincerely,

/s/ Penny Hoge

My address is:

2300 Iris Ave.
Boulder, Co. 80302

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Chevron U.S.A Inc.
700 South Colorado Blvd., P. O. Box 599, Denver, CO 80201

Richard T. Hughes
Staff Analyst
Legislative and Regulatory Affairs

June 21, 1985

Grand Junction Draft RMP/EIS

Forest Littrell, Area Manager
Grand Junction Resource Area
Bureau of Land Management
764 Horizon Drive
Grand Junction, CO 81506

Dear Mr. Littrell:

The Grand Junction Draft Plan is among the most comprehensive and yet most comprehensible of the federal land management plans I have reviewed to date. It is a commendable achievement for you and your staff to have dealt fairly, completely, and clearly with the myriad resources existing in the Grand Junction RA.

Sincerely,

Richard T. Hughes

RTH:kk

Central Region – Exploration, Land and Production

22

The Nature Conservancy

Rocky Mountain Heritage Task Force
1520 Pennsylvania Street, Suite 19C
Denver, Colorado 80203

June 21, 1985

Mr. Forest Littrell
Bureau of Land Management
Grand Junction Resource Area
764 Horizon Drive
Grand Junction, CO 81506

Dear Mr. Littrell,

Thank you for providing us with a copy of the Draft Resource Management Plan and Environmental Impact Statement. We are pleased to have the opportunity to comment on the Draft Plan. The Nature Conservancy is a non-profit, national membership organization dedicated to the preservation of biological natural diversity. First priority is given to preserving those areas that safeguard rare or endangered species and critical ecosystems, whether they are on private or public lands.

The Colorado Natural Heritage Inventory, working in conjunction with The Nature Conservancy, has been working for the past four years on collection of data on the status and distribution of the "elements" of Colorado's biological natural diversity: rare plant and animal species, plant communities, and aquatic systems. Data have been compiled from a broad range of sources (herbarium records, publications, field work, and biologists) on these elements. This information provides an objective basis for determining the rarity and status of species within the state. The Inventory is now incorporated into the Colorado Natural Areas Program.

The Colorado Natural Heritage Inventory, like 42 state Heritage Programs initiated by The Nature Conservancy, employs standardized methods to process information about a state's natural elements. All Heritage programs are connected through a larger, nation-wide information system that provides a global perspective to the concept of rarity. Ranks are assigned based on both global and state importance. An explanation of The Nature Conservancy's system for ranking species according to their overall rarity can be found in Appendix A. Additional information on state Natural Heritage Programs is in Appendix B.

National Office: 1800 North Kent Street, Arlington, Virginia 22209

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The Heritage Inventory data base contains significant occurrences of a number of the elements of Colorado's natural diversity within the Grand Junction Resource Area. Our comments on the Draft RMP/EIS are chiefly directed towards the recognition and protection of the elements and sites where they occur.

SPECIAL MANAGEMENT AREAS

We strongly support Special Management Area (SMA, which includes Research Natural Areas, RNAs and Areas of Critical Environmental Concern, ACECs) designation for Unaweep Seep, Pyramid Rock, Badger Wash, Rough Canyon and Skipper's Island to insure protection of sensitive, threatened and/or endangered species, and important remnant vegetation.

We are concerned that there are no proposed ACEC's in the Preferred
240 Alternative, and urge you to reconsider designation of the proposed Badger Wash ACEC. Designation would provide protection and management of unique biological elements.

The proposed areas include Unaweep Seep, Pyramid Rock, Badger Wash, Rough Canyon, and Skipper's Island. Upon designation, we recommend that you follow through with strong protective management plans for these areas. A brief summary of the proposed areas and our comments follow.

1. Unaweep Seep RNA provides habitat for the rare Great Basin Silverspot Butterfly (Speyeria nokomis nokomis), known from only three locations in Colorado (G1G1 and Category 1, Federal Register, December 28, 1983).

Unaweep Seep is actually already a designated RNA and designated Natural Area with the Colorado Natural Areas Program. We strongly support full protection of this site to insure the long-term viability of this unique butterfly. We recommend that you allocate funds for monitoring and research on this butterfly by professional entomologists.

2. Pyramid Rock proposed RNA is a registered Natural Area with the Colorado Natural Areas Program. Pyramid Rock provides habitat for two Colorado Species of Special Concern, the Uinta Basin hookless cactus (Sclerocactus glaucus, G3S3), a federally listed threatened species, and the DeBeque Phacelia (Phacelia submutica, G2S2), which is a candidate species for listing (Category 2, Federal Register, December 28, 1983).

We strongly support RNA designation for Pyramid Rock to provide

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the best protection for these endemic plant species. We are pleased that you have included this site for RNA status in the Preferred Alternative.

111 3. Badger Wash harbors two Colorado Species of Special Concern and a plant association of Critical National Concern. The site contains one of two good condition examples currently known for the Tall cryptantha (Cryptantha alata, G3S2), a candidate for listing (Category 2, Federal Register, December 28, 1983), and a large population of the Grand Valley buckwheat (Eriogonum contortum, G3S3). This site also contains the best condition site for the Critical National Concern Plant Association, Gardner's saltbush/Salina wildrye (Atriplex gardneri/Elymus salina, G2S2) currently known in the Mancos shale region.

The protection of the site "from surface disturbing activities" needs clarification and is not adequate for full protection (p. 55). Although proposed for ACEC designation, Badger Wash was not included in any of the alternatives except the Protection Alternative. BLM should review its decision not to include Badger Wash as an ACEC in the Preferred Alternative. We strongly support ACEC designation for Badger Wash, and hope that you will include it as such in the final RMP.

4. Rough Canyon proposed RNA harbors populations of both the Spineless hedgehog cactus, a federally listed Endangered species (Sclerocactus triglochidiatus var. inermis, G3S2) and the Grand Junction Milkvetch (Astragalus linifolius, G2S1), a candidate species for listing (Category 2, Federal Register, December 28, 1983).

112 Rough Canyon is proposed for RNA designation in the Preferred Alternative, but was not outlined on the Preferred Alternative Map. We strongly support RNA designation for this site. Why is it not included in the Habitat Management Schedule for the Preferred Alternative (Appendix F, Table F-4, p. 282)?

256 5. Skipper's Island proposed ACEC is mentioned in the draft RMP (p. 128) as being "widely recognized for unique value to sensitive, threatened and endangered species," but is not included as an ACEC in the Preferred Alternative (p. 67). Yet in Chapter 5, Environmental Consequences, under Impacts from Land Tenure Adjustment, you say that "Disposing of Skipper's Island would potentially reduce critical riparian habitat and resting areas for bald eagles and other sensitive species." If bald eagles (Endangered species) are utilizing the area, certainly Skipper's Island can't fit the criteria set up for disposal. We recommend this area for Special Management Area (ACEC or RNA) designation to provide full protection for this riparian habitat.

241 The Draft RMP is lacking in a Special Management Area section in

241 the Appendix outlining the significance, description, location, and specific management requirements for the proposed sites in the Preferred Alternatives.

THREATENED AND ENDANGERED SPECIES

Records from the Colorado Natural Heritage Inventory indicate that there are several Species of Special Concern for Colorado which occur in the Grand Junction Resource Area but are not included in Table 3-9, Comparison of T/E and Selected Sensitive Species in the Grand Junction BLM Resource Area (p. 129). Location data on these taxa are available through the Colorado Natural Areas Program. These taxa are:

Scientific name	Common name	Rank	Status
Astragalus naturitensis	Skiff milkvetch	G3S2	3C
Astragalus musiniensis	Ferron milkvetch	G3S1	
Astragalus wetherillii	Wetherill's milkvetch	G3S1	3C
Cryptantha caterhoutii	Caterhout's cryptantha	G3S1	
Eriogonum contortum	Grand Valley buckwheat	G3S3	
Gilia stenothyrsa	Narrow spike gilia	G3S1	
Lomatium latilobum	Wide-leaf lomatium	G1S1	2

113 There is potential habitat within the Resource Area for the following species on oil shale lands (not included in the draft RMP):

Astragalus debequaeus	DeBeque milkvetch	G1S1	
Lesquerella congesta	Bladderpod	G1S1	2
Lesquerella parviflora	Bladderpod	G1S1	2
Mentzelia argillosa	Clay mentzelia	G2S1	3C
Physaria obcordata	Double bladderpod	G1S1	2

The two federally listed species, Sclerocactus glaucus (Threatened) and Sclerocactus triglochidiatus var. inermis (Endangered) have draft Recovery Plans which should have been addressed and reviewed in all alternatives of the draft RMP (briefly discussed on p. 43). We recommend further inventory on these and other sensitive taxa (mentioned on p. 129: Astragalus linifolius, Astragalus lutosus, Cryptantha alata, Festuca dasyclada, Lyrodesmia deliciosensis, Phacelia submutica, Thelesperma bellophilum), to determine the total distribution and the habitat requirements of these species, so that this information may be incorporated into planning of all projects within the resource area. Amsonia jonesii, presently on the State list

of Species of Special Concern, is reported to grow in Rabbit Valley (Dr. William A. Weber, pers. communication) and should be monitored.

PLANT ASSOCIATIONS

Good condition sites for eight Plant Associations of Critical National and State Concern, as identified by the Colorado Natural Heritage Inventory, occur within the Grand Junction Resource Area. These include:

	PLANT ASSOCIATION	RANK
1.	Columbine/Eastwoods monkeyflower hanging gardon (Aquilegia micrantha/Mimulus eastwoodiae)	G4S2
2.	Mat saltbush shale barren (Atriplex corrugata)	G3S2
3.	Shadscale saltbush/Salina wildrye (Atriplex confertifolia/Elymus salina	G3S2
4.	Gardner saltbush/Galleta grass (Atriplex gardneri/Hilaria jamesii)	G2S1
5.	Utah juniper/Salina wildrye (Juniperus osteosperma/Elymus salina)	G3S3
6.	Utah juniper-Colorado pinyon pine/ Utah serviceberry-Mountain mahogany (Juniperus osteosperma-Pinus edulis/ Amelanchier utahensis-Cercocarpus ledifolius)	G2S2
7.	Utah juniper-Colorado pinyon pine/Galleta grass-Indian ricegrass-Needle and thread (Juniperus osteosperma-Pinus edulis/ Hilaria jamesii-Oryzopsis hymenoides-Stipa comata)	G3S2
8.	Black greasewood/Torrey seepweed (Sarcobatus vermiculatis/Suaeda torreyana	G3S3

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114 The Nature Conservancy believes that protection of these remnant plant associations through designation of Special Management Areas would enable those areas to be used as reference areas for baseline data collection which would assist land managers in making long-term range decisions. We urge formal designation for the best condition sites and development of appropriate management plans for occurrences of remnant vegetation, as this is the best way to assure long-term preservation of these valuable vegetation remnants.

ADDITIONAL COMMENTS

The following comments address specific sections and corrections needed in the draft RMP/EIS.

115 "Applying stipulations (No Surface Occupancy, No Surface Disturbance) to all known locations and sites with high potential for existance of threatened and endangered species would guard against adverse impacts to threatened and endangered species, their habitat..." (p. 209) is commendable, but does not provide adequate protection for these species. Stipulations cannot be used to restrict existing grazing, timber or fire salvo, right-of-way permits, or oil shale leases. Was an in-depth survey conducted to determine all the potential locations of these species? Additionally, this does not provide for sensitive plant species. Please define No Surface Disturbance, as this is not in the glossary.

116 " Habitat Management Plans will be prepared to protect both listed and sensitive species as key management species (p. 43)." But on p. 209, it says that there will only be two HMPs prepared that choose T/E species as key management species. How will this be implemented? Will you really only be preparing HMPs for only two sites to protect rare species? Do you have sufficient documentation of all occurrences of these species to prepare other HMPs. This is confusing.

113 If, as mentioned in Chapter 5, Preferred Alternative Impacts, under Impacts from Locatable Minerals, Mineral Materials, Coal and Oil and Gas Management (on p. 210), coal unsuitability criteria would not protect sensitive plant species, in particular the Maniesa milkvetch (Astragalus musiniensis), why not try to protect this species in some other way? This species was not listed in Table 3-9 (p.129) as being a sensitive species.

117 Peregrine falcons and sensitive plant species should have acreage set aside (Table 2-23, p. 65, Summary comparison of Management Actions Recommended for Threatened and Endangered Species Management) for Protection Habitat Management as recommended under the Protection Alternative for the preferred Alternative.

298 In Table 2-20 (p. 61), Public Utility Restriction Recommendations, only Pyramid Rock and Unaweep Seep areas are considered unsuitable

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299 for public utilities because they contain resource concerns that could not be adequately mitigated. Sensitive plant species, the Cryptantha gilaa site, Badger Wash Uplands have no unsuitable acreage under the Preferred Alternative, therefore these areas would qualify as suitable for public utilities.

Finally, it has been frustrating not to have an index to use in preparation of comments on the Draft RMP.

FUTURE WORK ON SMA'S AND SENSITIVE SPECIES

116 The Colorado Natural Heritage Inventory, under the Colorado Natural Areas Program, and other scientists are continually discovering and verifying occurrences of rare species and exemplary plant associations, and incorporating this new information into the data base. The Grand Junction Resource Area should recognize this in its planning and management process and make allowances for incorporating new information into those processes.

118 BLM may want to consider undergoing Cooperative Management Agreements with The Nature Conservancy for sharing the management of Special Management Areas and other good condition sites harboring sensitive species and remnant vegetation. This will help to insure that these areas are conserved in the future.

We appreciate having the opportunity to comment on the draft RMP/EIS for the Grand Junction Resource Area, and request that our comments be addressed and included in the Final RMP. We look forward to working with you in the future towards the conservation of elements of biological natural diversity.

Sincerely,

Betsy Neely

Betsy E. Neely

cc: Kannon Richards
Dave Kuntz
Rick Athearn
Sydney Macy
Dave Mladenoff
Carole Combs

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192 [redacted]

257 [redacted]

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United States Department of the Interior

BUREAU OF RECLAMATION
UPPER COLORADO REGIONAL OFFICE
P.O. BOX 11568
SALT LAKE CITY, UTAH 84147

UC-151
120.1

JUN 25 1985

Memorandum

To: Area Manager, Bureau of Land Management, Grand Junction Resource Area, 764 Horizon Drive, Grand Junction, Colorado 81506

From: Regional Director
Bureau of Reclamation

Subject: Review of Draft Environmental Impact Statement on the Grand Junction Resource Area

We have reviewed the subject document and have the following comments:

258 Land Tenure Management: Table 1-1, Land Ownership in the Grand Junction Planning Area, does not reference any lands in Federal ownership that are administered by Reclamation. Reclamation administers withdrawn, fee title, and easement lands in Delta, Garfield, Mesa, and Montrose Counties. These are used for the Grand Valley, Silt, Collbran, Uncompahgre, and Colorado River Storage Projects (Aspinall Storage Unit). The BLM also administers certain lands on the Grand Valley and Dominguez Projects that are withdrawn for Reclamation purposes.

221 131 Several of the WSAs described in the DES include Reclamation withdrawn lands. Reclamation is concerned as to the impact this may have on water resource development should these WSAs become designated as wilderness areas. There should be a full analysis of these impacts in the FES. Also, what would be the impact on salinity control efforts in the Colorado River Basin of these designations?

259 Under the Planning Criteria for Land Tenure Adjustments (Pages 19 and 20), we wish to have the following statement entered under Category 11, Disposal Tracts:

> Certain lands, proposed for disposal, are withdrawn or have other restrictions. These restrictions will need to be lifted by the holding entity prior to initiation of the disposal process, specifically, lands withdrawn for Reclamation purposes.

The withdrawal review process may include proposals to lift the withdrawals on any lands excess to Reclamation needs.

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242 Three of the alternatives identify tracts of land for disposal by exchanges or sales. Seven of the tracts are located along the Colorado River downstream from Fruita, Colorado. Of these seven, six (414, 415, 416, 431, 432, and 433) include floodplain areas and valuable riparian habitat. Therefore, they should not be considered for sale under BLM's criteria (Category I Retention Areas, Page 19). These lands would be subject to exchange proposals, boundary adjustments, and recreation and public purpose applications.

Reclamation is interested in these seven tracts in connection with the Grand Valley Unit of the Colorado River Basin Salinity Control Project. The Fish and Wildlife Service, in cooperation with the Colorado Division of Wildlife, has prepared a Fish and Wildlife Coordination Act report on the unit. This report recommends that Reclamation purchase or acquire and develop lands in the Colorado River floodplain to offset wildlife habitat losses from the unit. These seven tracts, in combination with adjacent parcels of private lands, are very important for the successful fulfillment of this recommendation. Reclamation therefore requests that these lands be retained in public ownership for this purpose. It is hoped that the total wildlife area would eventually be managed by the Colorado Division of Wildlife.

cc: Regional Environmental Officer, Office of the Secretary, E&R Center

25

10951 Fairfax Court
Thornton, CO 80233
June 22, 1985

Forest Littrell, Area Manager
Bureau of Land Management
764 Horizon Drive
Grand Junction, CO 81506

Dear Mr. Littrell:

I would like to comment on the wilderness recommendations in the draft Resource Management Plan for the Grand Junction area. Overall, I am pleased by the BLM proposals, but I am distressed by the omission of two outstanding areas, the Little Bookcliffs Wildhorse Area, and the Palisade. Both of these areas are eminently deserving of wilderness designation. The Little Bookcliffs area is, as you know, one of the few remaining roadless areas in the Bookcliffs, and offers one of the last opportunities we will ever have to preserve, relatively unbroken, the unique canyon ecosystems of the Bookcliffs. Incidentally, Demaree Canyon also would be a good wilderness addition to the Bookcliffs area. The Palisade is remarkable for its diversity of geologic and biologic resources, all packed into a small area. This region is both a scenic and a potential educational resource which can best be preserved as wilderness. Please reconsider your omission of these areas, and recommend them for wilderness designation.

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Sincerely,

Gerald Audesirk

Gerald Audesirk

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June 27, 1985

Mr. Forest Litterel
Bureau of Land Management
764 Horison Drive
Grand Junction, Co. 81506

Ref: Grand Jct Resource Mgmt. Area
Environmental Impact Statement

Dear Mr. Litterell:

Mr comments on the subject resource mgmt area environmental impact is basically on Wild Horses.

You propose to expand the Little Book Cliff Wild Horse Range by 2,380 acres from and existing 27,065 acres. Why?

160 Lets eliminate the Wild Horse Range entirely as the animal there are not "wild" horses. They are feral animals. Where did you do your research to establish these feral horses as wild and deserving a range?

If you will contact Mr. Orlin Corn, Lamont, Co. 80501 you will find from a person who lived on the land/new range for horses until 1940. He states that there were no wild horses there prior to end of World War II when a rancher who bought the ranch made no attempt to round up horses from the rancher who died.

I suspect BLM set the range aside to appease local horse lovers rather than basing the decision on careful criteria as a reasonal prudent individual or agency would do. How can we ever reduce the deficit when one agency of Federal Government continues a policy of protecting feral animals under the guise they are "wild."

Please Federal Government, show some responsibility here. Lets save the money it costs to manage this range and get rid of the animals.

See also, Western Horseman, July 1954, P. 43 for additional data.

Sincerely,

Gilbert R. Wenger
Gilbert R. Wenger
372 30 Road
Grand Junction, Co. 81504

(A comparison: Suppose Mesa County turns it's 2,000 cats and dogs picked up each year and set to death, were turned loose in the Book Cliffs. Then BLM could establish a Wild Cat and Wild Dog Range) (to humor intended)

27

6224 Powell Road
Parker, Colorado 80134

June 26, 1985

Mr. Forest Littrell
Bureau of Land Management
Grand Junction Resource Area
764 Horizon Drive
Grand Junction, Colorado 81506

Dear Mr. Littrell:

I am writing to comment on the Resource Management Plan for the Grand Junction Resource Area. I have reviewed the Plan carefully.

I support the Protection Alternative for the management of Wilderness Study Areas. I agree with the recommendation for wilderness protection of 149,000 acres. I also support the areas that are not recommended in the Preferred Alternative. I would like to see the BLM recommend the Little Bookcliffs Wildhorse Area for wilderness protection. Although there are problems with pre-FPLMA oil and gas leases, I feel boundaries could be worked out to protect the wilderness charcteristics of the area. Another area that deserves wilderness protection is the Palisade WSA. It is one of the most diverse areas in Colorado. The last area is DomAree Canyon which is home to herds of deer and mountain lion.

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I commend the BLM for recommending non-motorized recreation for Granite Creek, Hunter/Garvey Canyons and Rough/Bangs Canyons, for special attention to riparian zones during implementation of grazing activities and management of the lower Cold River through Ruby and Horsethief Canyons to maintain the values which resulted in the river being recommended for Wild & Scenic designation.

I disagree with plans I feel would fail to manage the lower Dolores River to protect its recreational and scenic values for future Wild and Scenic River designation. I also oppose boundary changes which would reduce the size of Dominguez Canyon because of possible trespass onto private land.

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I again want to commend you on the hard work that went into the Plan and the degree of protection you have recommended for these magnificant lands. I urge you to make the changes I have written about which will extend wilderness protection to areas not already recommended.

Thank you.

Very truly yours,

Lawrence A. Papp

Lawrence A. Papp

Sierra Club

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12623 -- 10th Ave. N.E.
Seattle, WA 98125
(206) 362-5269
June 25, 1985

Frosty Littrell, Area Manager
Grand Junction Resource Area
Bureau of Land Management
764 Horizon Drive
Grand Junction, CO 81504

Dear Sir:

This letter is written in order to comment on the draft Resource Management Plan (RMP) for the Grand Junction Resource Area. In general, your planning staff should be commended for its honest, hard work in grappling with the issues in your Resource Area. The draft document reflects far more care than I have seen in other RMPs released by the BLM.

I want to direct most of my comments to the wilderness recommendations in the draft plan. But before doing so, I must mention several other issues. First of all, having rafted through Ruby and Horsethief Canyons, I must strongly endorse the BLM's proposal to withdraw those portions of the Colorado River corridor from mineral development. This is something that should have been done a long time ago. I just wish that the draft RMP proposed a similar withdrawal of the Dolores River downstream from Gateway.

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Next, the draft RMP is also on the right track in proposing various semi-primitive, non-motorized areas as well as six Research Natural Areas. The draft document gives ample rationales for doing so, and the decision ought to stand in the final RMP.

Turning to the wilderness recommendations. I find the draft RMP to be weakest in its plans for the Bookcliffs. Basically the BLM intends to abandon the region to hydrocarbon leasing and development. That decision alone is just plain wrong, but it becomes unconscionable when the BLM recommends against wilderness designation for the lone two Wilderness Study Areas (WSAs) in the Bookcliffs. The preferred alternative is supposed to be a moderate course between the Protection and the Production alternatives, but these recommendations against the Little Bookcliffs and Demaree Canyon WSAs tilt management of the region completely away from any kind of balanced approach. Given the small acreages of the two WSAs, Wilderness designation

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223 seems a small price to pay to preserve some wildlife habitat in the Bookcliffs. This is especially important in the case of the Little Bookcliffs WSA with its wildhorse herd.

At the opposite pole, the wilderness recommendations for Black Ridge, Black Ridge West, and Sovenup Mesa WSAs are correct and excellent. I have hiked up into Rattlesnake and Hee Canyons, and can testify to the national significance of the wilderness values there. The BLM has taken the right step in proposing to close the "road" which separates the two WSAs on Black Ridge as well as other vehicle paths in the area.

205 I wish that the BLM had applied the same reasoning to The Palisade WSA. The BLM belittles itself and its authority in claiming that the agency can not stop off-road vehicle (ORV) intrusions into the WSA. The BLM can, and should stop ORVs from destroying this unit's diverse beauty.

203 Finally, I oppose the deletions in the Dominguez Canyons WSA, and urge you to recommend the entire unit for wilderness designation. The question of trespass onto private land is strictly irrelevant. In the first place, the BLM is required under federal law to manage public lands in the public's best interest -- not in the interest of nearby landowners. Moreover, wilderness designation will not affect trespass, or the lack thereof, in any way. The Dominguez Canyons contain numerous wildlife species, important archeological sites, and magnificent scenery. The WSA should be protected in its entirety.

Thank you for this opportunity to comment on the draft Grand Junction Resource Management Plan. Please inform me of your final decisions by sending me a copy of the final RMP.

Sincerely,

James M Baker

James M. Baker
National BLM Wilderness Chair
Sierra Club

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Mesa County Planning

559 White Ave. Rm. 60
Grand Junction, Colorado
81501-2643

(303) 244-1628

June 4, 1985

Mr. Forest Littrell
Bureau of Land Management
Grand Junction Resource Area
764 Horizon Drive
Grand Junction, CO 81503

RE: Comments on Draft Environmental Impact Statements on the Grand Junction Resource Management Plan

Dear Mr. Littrell:

The Mesa County Commissioners, Planning Commission and staff have reviewed the Draft Resource Management Plan for the Grand Junction Area of the B.L.M.

The document is, on the whole, a complete and well researched tool for managing resources under the B.L.M.'s jurisdiction.

We have enjoyed a cooperative working relationship with the B.L.M. and County Planning and hope to continue this relationship in the future.

We have jointly participated in the permitting of major facilities such as the Public Service 230 KV transmission line, the Colorado Ute 340 KV transmission line, the Chevron Clear Creek Environmental Impact Statement, the Gary-Getty Pipeline Environmental Assessment and numerous other projects.

Many of the comments we raised during the scoping meetings seem to be addressed in the Preferred Alternative, which we generally favor.

In particular, we were glad to notice that the B.L.M. lands adjacent to Walker Field have not been targeted for disposal. This will help protect the airport from unwise development adjacent to its runways and will help fulfill Mesa County Land Use and Development Policy #23 Walker Field Airport Policy.

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Letter to Mr. Forest Littrell
June 4, 1985
Page 2

The following specific comments apply to the preferred alternative and are offered as proposed amendments to it:

188 1. Designation of Unaweep and the Dolores River Canyons as a special study area for joint B.L.M., Forest Service, and Mesa County study and development of specific policies and guidelines for the management of these unique resources. Unaweep Canyon, in particular, represents a major visual, recreational, and environmental asset to Mesa County, but specific interagency guidelines need to be developed for its use and protection. (See Mesa County Land Use and Development Policy #19.)

242 2. Special treatment of parcels slated for disposal in the floodplains. Parcels GD 414 and Gd 416 are in the vicinity of the Loma boat launch and should not be disposed of if they will constrict or inhibit the use of this facility. (See Mesa County Land Use and Development Policy #27, page 2.)

242 All parcels which are slated for disposal in the floodplain should be offered first to public or private non-profit agencies whose goal is retention of these lands as permanent open space. They should be clearly designated as parcels within the 100 year storm and not necessarily to be considered building lots under Mesa County zoning.

242 From our observation, these parcels are as follows:

Colorado River

Gd 414, Gd 416, Gd 415, Gd 431, Gd 432, Gd 433, Gd 417, Gd 418, Gd 161, Gd 160, Gd 158

Plateau Creek

260 Gd 45, Gd 44, Gd 43, Gd 37

Cow: Creek

Gd 41

Agencies which might be likely repositories for such lands include the Colorado Division of Wildlife, the Mesa County Audubon Society or the Mesa County Land Trust.

261 3. Retention of parcel Gd 11 adjacent to Vega Reservoir or transfer to the State Recreation Area. Sale of this property to a private developer could cause problems in obtaining

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Letter to Forest Littrell
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Page 3

261 building permits, since this area has experienced mud slides and property losses in the past. Dense development above the reservoir with septic systems could also cause long term problems with water quality. There is presently no sewer service in the Vega area. There are many larger parcels which are currently vacant and available for development in the area.

245 4. Retention of Parcel Gd 305 for protection from flash flooding in Monument Canyon Wash. The alternative would be to dispose of this parcel to a public or private non-profit agency which will hold the lands as permanent open space and as a trail head for Monument Canyon Trail in the Colorado National Monument. (Mesa County Land Use and Development Policy #27.)

245 5. Retention of Parcel Gd 304 for incorporation into the Colorado National Monument as a trail head or disposal to a public or private non-profit agency which will hold the lands as permanent open space. (See Mesa County Master Plan of Parks.)

245 6. Disposal Parcel Gd 301 in the Redlands is within the 201 Persigo Sewer Study area and is zoned R2 (1/4 acre lots - residential) and R2A (2 acre lots - residential). This area has severe development restraints, however. There are no sewer lines existing or contemplated, no water lines, limited road system (Little Park Road and Monument Canyon Road), no irrigation, no fire flow, severe topographic and geological constraints, and flash flood potential. Under these circumstances, we would recommend that this parcel not be released or, if released, be sold to developers with the understanding of the severe limitations to this site. (See Mesa County Land Use and Development Policies #2, #3, #4, #6 and #19.)

246 7. Disposal Parcel Gd 201 in Orchard Mesa has many of the same constraints as parcel Gd 301 above: lack of sewer, water, fire flow, irrigation, topographic and geological constraints, flash flood potential, lack of roads, etc. These dryland hills are subject to erosion, and shrink-swell soils predominate. We recommend that this parcel be retained or, if sold, be subject to the limitations mentioned above.

8. Wilderness Study Areas
The Wilderness Study Areas proposed in the Preferred Alternative seem reasonable and consistent with Mesa County's Land Use and Development Policies. They are:

Letter to Forest Littrell
June 4, 1985
Page 4

A. Sewemup Mesa WSA
(on the border between Mesa and Montrose Counties on the Dolores River)

B. Dominguez Canyon WSA

C. Black Ridge WSA

194 9. Potential conflicts between off road vehicles and grazing land. The area north of I-70 and east of the airport has been grazed for many years. Designating this area for off-road vehicles could set up conflicts with cattle grazing. While the need to have such designated areas is understood, they should be in areas that are clearly outside the grazing areas. We would suggest a smaller designated area and suggest a permitting or license procedure for all off-road vehicles on B.L.M. land.

224 10. Designation of the Dominguez Wilderness Study Area should not exclude construction of the Dominguez Dam project of the Bureau of Reclamation. While the W.S.A. appears to avoid the Gunnison River bank, it might be used as an argument against the Dominguez Dam. We would recommend that this designation in no way precludes the construction of this project.

11. Encourage proper grazing on dryland hills where no other uses are contemplated. Grazing will prevent, to some extent, tall grasses and possible wildfire danger.

We look forward to continuing the cooperation between Mesa County and the B.L.M.

Sincerely,

Richard C. Pond
Chairman
Mesa County Commissioners

Paul Nelson
Chairman
Mesa County Planning Commission

ea
cc: Gordon Tiffany, Mesa County Administrator
Bernett Boeschenstein, Mesa County Planning
Bob Myers, Mesa County Parks
Denny Huffman, Colorado National Monument
Helen Traylor, Audubon Society
Lisa Evans, Colorado Dept. of Wildlife
Harry Talbott, Mesa County Land Conservancy

27 June 1985

Forest Littrell
Bureau of Land Management
Grand Junction Resource Area
764 Horizon Drive
Grand Junction, Colorado 81506

Dear Mr. Littrell:

The Grand Junction District is to be commended on its effort in trying to preserve valuable wilderness in its region, as outlined in the recent Resource Management Plan. As a frequent visitor to many of the Wilderness Study Areas within the district, I agree wholeheartedly with the inclusion as BLF Wilderness of such unique areas as Black Ridge Canyons, Dominguez, and Sewemup Mesa. I would, however, like to make a few comments on features which may have been overlooked in the study.

205 To begin with, I disagree with the decision not to include The Palisade WSA as wilderness. I believe the reasons cited for its exclusion have been overstated, while the most compelling arguments favoring its designation appear to have been neglected. First of all, the actual value of the pinyon-juniper woodlands as firewood has been greatly exaggerated. There are thousands of acres of similar woodlands in the vicinity which are not under consideration for preservation as wilderness, and which have the further advantage of being far more accessible. Not only is firewood a resource of marginal value, but its abundance in the area assures that the demand can be met for generations to come without the need for tapping the woods within The Palisade WSA. Secondly, those areas within the WSA (e.g., Bull Draw) where firewood has been cut in the past are not really essential to maintaining the integrity of the area as wilderness. It is

205 somewhat ironic that, if the primitive roads serving these firewood areas had been better established at the onset of the study, they would have been excluded from the original WSA, and this reason for recommending exclusion of The Palisade would never have come up.

In offering to preserve The Palisade formation itself while returning most of the WSA to multiple use, BLM is overlooking the most important argument for consideration of the area in the first place: the remarkable diversity of plant life, wildlife habitat, and scenic features which The Palisade WSA--and no other in Colorado--has to offer. The Palisade itself 205 contains an insignificant portion of this diversity; the real value lies instead in the lands to the west and northeast. Here one can travel from one of the driest deserts in the state upward through several life zones, including sagebrush, pinyon-juniper, ponderosa pine, aspen, and several different types of riparian ecosystems, including the incomparable Unaweep Seep. Only here can one observe many species normally found only in the states to the southwest.

The views of Dolores and Unaweep Canyons and the surrounding region seen from the miles of rim area included within the present WSA offer far more recreational opportunity than the virtually inaccessible Palisade formation. The uniqueness of this desert-to-canyon-to plateau traverse, with its conveniently spaced watering spots, is so outstanding that Volunteers for Outdoor Colorado plans to survey the area soon as the possible site for a major trail building project which would involve a number of other civic groups as well. It is hoped that BLF will also cooperate in this effort.

213 A further consideration should also be studied in setting the bound-

213 aries of the Sewemup Mesa Wilderness. This is the possibility of future expansion into the Roc Creek area to the west, on lands mostly under the jurisdiction of the U.S. Forest Service, but including some additional BLM lands as well. This option takes on even greater importance in view of the present plan to exchange BLF and USFS lands. An artificial administrative distinction which may not even exist in a few more years should never be used as a barrier to an objective review of the wilderness as it actually exists in nature.

Respectfully,

James R. Guadagno
555 County Road 5
Ridgway, CO 81432

31

United States Department of the Interior
NATIONAL PARK SERVICE
ROCKY MOUNTAIN REGIONAL OFFICE
655 Parfet Street
P.O. Box 25287
Denver, Colorado 80225

IN REPLY REFER TO

L7619 (RMR-PC)

JUN 27 1985

Memorandum

To: Area Manager, Grand Junction Resource Area, Bureau of Land Management, Grand Junction, Colorado

From: Associate Regional Director, Planning and Resource Preservation, Rocky Mountain Region

Subject: Draft Resource Management Plan and Environmental Impact Statement (EIS), Grand Junction Resource Area, Colorado (DES 85/11)

We have received the subject draft resource management plan and EIS and find that it provides for proper conservation of Nationwide Rivers inventory and National Wild and Scenic Rivers System stream values and will cause no adverse effect on lands or programs administered by the National Park Service.

Richard A. Strait

32

THIS LETTER HAS BEEN REPRODUCED

July 1, 1985

Forest Littrell
Bureau of Land Management
764 Horizon Drive
Grand Junction, Colorado

Dear Mr. Littrell,

I am writing to express my support for the Protection Alternative in the Resource Management Plan and Environmental Impact Statement for the Grand Junction Resource Area.

I think the seven wilderness study areas should be recommended for wilderness designation. Because of the need for this type of arid plateau and canyon country to be part of the wilderness system in Colorado.

I have had the pleasure of backpacking in Dominguez Canyon, and going on day hikes in several of the other wilderness study areas. I found these places beautiful and unique.

Last, and I feel most important is the need to save a wilderness legacy to the future generations.

Sincerely,

/s/ Randall Shepard
Road 1975 #829
Austin, Colorado
81410

33

THIS LETTER HAS BEEN REPRODUCED

JOHN R. SWANSON
P.O. Box 922
Berkeley, CA 94701

June 24, 1985

Bureau of Land Management
764 Horizon Drive
Grand Junction, Colorado 81506

Dear Sirs:

Please accept my comments, as follows, concerning Draft Environmental Impact Statement - Resource Management Plan - Grand Junction Resource Area.

I have been acquainted with this portion of Colorado for many decades; and continue of the firm opinion that this Grand Junction Resource Area contains outstanding wilderness, scenic, wildlife-fish, botanic and cultural resources of certain national importance.

An area that provides a vital and, as all Americans hope, a lasting refuge for man and for all life on this endangered planet. An area, then, that fully benefits Man, and fully benefits all life, on this damaged Earth.

I wish to advise that I oppose the Preferred Alternative - Plan as such will decimate surface and sub-surface resources and, thus, will destroy this Grand Junction Resource Area.

I, then, fully recommend that as concerned citizens we save this Grand Junction Resource Area by establishing such area as a permanent dedicated preserve.

With all such units of the Bureau of Land Management established as permanent dedicated Preserves.

As the purpose of the Bureau of Land Management is to preserve all of the Wilderness, Wildlife, Fish, Botanic - all Biological Resources - Scenic and Cultural Resources located on the areas managed by this Bureau of Land Management. With each such Preserve to protect watersheds, preserve ecosystems, save and enhance all wildlife, fish, and botanic habitats areas, protect and promote all Biological Resources and their diversity, preserve rivers and streams-creeks, restore-recover all used-damaged areas to their natural environmental condition, and to preserve, protect, strengthen, and expand wilderness.

33

I, then, fully urge that the following areas and acres located on this Grand Junction Resource Area - Bureau of Land Management - only - be fully classified and permanently protected as Wilderness; as each such unit features superb wilderness attributes, and to be included in our National Wilderness Preservation System - at this time -:

Sewemup Mesa	24,691
Demaree Canyon	27,853
Little Bookcliff Wildhorse Area	33,218
Black Ridge Canyons	22,647
Black Ridge Canyons West	59,013
The Palisade	28,275
Dominguez Canyon	109,368
South Shale Ridge	41,319
North East Creek	31,274

Plus, and additional 369,000 acres.

To secure a total of some 748,000 acres of Wilderness to be located on this Grand Junction Resource Area - only - and Bureau of Land Management areas - only - and to be included in our National Wilderness Preservation System - at this time -.

To include rivers and streams-creeks in our National Wild and Scenic Rivers System.

To include this area as a National Critical Habitat area; to save all life including Peregrine Falcons, Bald Eagles, Black-footed Ferrets, Mountain Lions, Spineless Hedgehogs and Uinta Basin Hookless Cactuses, as examples, only.

To establish, then, this Grand Junction Resource Area - Bureau of Land Management as a permanent dedicated National Wilderness Wildlife Biological Preserve.

With the selected planning and management alternative concerning this area, as follows:

Alternative Preservation Wilderness Wildlife Biological Scenic Resources

To eliminate roads so as to return this area to a necessary natural environment with no hydro activities as they destroy water resources. To end minerals, coal and oil/gas activities; as such activities destroy land, water, and air resources. With a ban on off-road vehicles so as to restore area to a natural environment.

To permanently ban all forms of surface and sub-surface development on all current, proposed and potential wilderness, including Wilderness Study Areas, with no release of Roadless Areas.

To acquire all inholdings on all Public Lands, with no disposal of any Public Lands.

For when we save our Natural Lands and Waters; we save the World.

Sincerely,

/s/ J. R. Swanson

34

GARFIELD COUNTY
Board of County Commissioners

FLAVEN CERISE
Carbondale 81623
ROBERT J. RICHARDSON
Rifle 81650
LARRY R. SCHAUFLER
Glenwood Springs 81601

COUNTY COURTHOUSE
109 8th Street Suite 300
Glenwood Springs, CO 81601-3303
Telephone (303) 945-8158
(303) 625-5571

ROGER LUDWIG
Administrative Assistant

July 1, 1985

Forest Littrell
Bureau of Land Management
Grand Junction Resource Area
764 Horizon Dr.
Grand Junction, Co 81501

RE: Comments on the March 1985 Grand Junction Resource Area, Resource Management Plan and Environmental Impact Statement

Dear Mr. Littrell,

Thank you for reviewing the draft Resource Management Plan for your Grand Junction Resource Area with us. We wish to put forth the following comments:

1. We strongly concur with the BLM's recommended alternative for the Western Garfield Area. We agree with the BLM in their finding that the area should be available for oil, gas and coal exploration, leasing and development. We think it is tremendously important for the long term economic health of the area that the Demaris Area not be designated as a wilderness area. As you have pointed out in the draft, the number of existing leases in that area make designation almost impossible.

289 2. We note that your preferred alternative plan is to acquire additional miles of road and trail easement along Carr Creek, Cow Ridge, Horse Mountain and Middle North Dry Fork. We do not object to those acquisitions if they can be done through a negotiated settlement with the private land owners. We strongly oppose the use of your rights of eminent domain to force private land owners into relinquishing right-of-ways. We urge you to work patiently with the land owners to resolve the respective interests and concerns.

Thank you for the opportunity to review the draft. We appreciate the many hours of careful work which have gone into the preparation of the draft. Thank you also for the extra effort you have made to bring pertinent points of the draft to our attention.

Sincerely,

Bob Richardson, Chairman
Garfield County Commissioners

BL/jp

35

THIS LETTER HAS BEEN REPRODUCED

24 June, 1985

Frosty Littrell, Area Manager
Bureau of Land Management
764 Horizon Drive
Grand Junction, CO. 81506

Dear Mr. Littrell

I am writing to give my comments on Grand Junction Resource Management Plan. I generally support the Protection Alternative and have the following comments.

177 It think it is a good idea to withdraw the Colorado River corridor in Ruby and Horsethief Canyons from mineral development. This helps protect this recommended Wild and Scenic River. I would also like to see the BLM do the same with the proposed Wild and Scenic area of the Dolores for the same reason.

I support the BLM's recommendation of designating six Research Natural Areas to preserve their scientific value.

180 I would like to see Northwest Creek in Unaweep Canyon managed as a semiprimitive, non-motorized recreation area as was proposed for Granite Creek, Hunter/Garvey Canyons and Bangs/Rough Canyons.

203 Sewemup Mesa and the Black Ridge Canyons deserve your wilderness
205 recommendation. I would like to see all of Demingue Canyon designated as
204 wilderness. Its being wilderness will not cause more trespassing onto private land. I believe Palisade's wilderness value and ecological diversity outweigh the off-road vehicle management difficulties. I believe Demaree Canyon and Little Bookcliffs should the designated as wilderness in order to protect at least a small portion of the Bookcliffs.

Thank you for this opportunity to express my views.

Sincerely,

/s/ Carolyn Beezley
301 29th St.
Boulder, CO 80303

36

June 29, 1985
Box 676
Norwood, Colorado 81423

Frosty Littrell, Area Manager
B.L.M.
764 Horizon Drive
Grand Junction, Colorado 81506

Dear Mr. Littrell;

The following are my comments concerning the draft Grand Junction RMP.

I generally support the Protection Alternative, I strongly support your recommendation for wilderness for Sewemup Mesa and I also believe you should recommend

217 The Maverick, the Bookcliffs and Demaree Canyon for wilderness. I feel that difficulty in managing an area as wilderness should be no reason for denying such designation and simply is a cop-out. I believe that desert and steppe ecosystems are grossly underrepresented in our wilderness system and surely need the protection provided by wilderness designation. We are blessed with several spectacular opportunities to protect such areas here in Western Colorado and I strongly feel that we should make

36

every effort possible to protect that which remains of our natural heritage.

180 I appreciate your designation of several areas as where semi-primitive, non-motorized recreation is emphasized and encourage you to add Northwest Creek in Unaweep Canyon to that list. I would also

177 request that you withdraw the Dolores River corridor downstream from Gateway from mineral development to protect one of our most unspoiled rivers.

One final comment concerning Demaree Canyon, I am most familiar with that area having worked in it for several summers for the BLM. I feel that it is truly one of the wilderness jewels of the BLM.

203 Probably the best way to protect and manage a wilderness area is through sheer size. This reduces visitor penetration and visitor impact. To reduce the size of an area to reduce trespass problems on an intermingled private land is a specious argument. Trespass will occur or not occur regardless of

203 WILDERNESS STUDY. I STRONGLY RECOMMEND THAT YOU SUPPORT THE FINAL 79,000 ACRES OF THE ADVANCED U.S.A. FOR WILDERNESS.

I AM ENCLOSING MY MARK OF YOUR DRAFT RMP AND FEEL IT IS ONE OF THE BETTER ONES OF WHICH I HAVE KNOWLEDGE.

SINCERELY

A. JAMES ROSENTHAL

Cleveland-Cliffs
Helping develop earth's resources to meet the world's needs
Western Division

818 Taughenbaugh Boulevard
Rifle, Colorado 81650-2730
Phone: 303-625-3445

July 1, 1985

Mr. Forrest Littrell
BUREAU OF LAND MANAGEMENT
Grand Junction Resource Area
764 Horizon Drive
Grand Junction, Colorado 81506

RE: DRAFT GRAND JUNCTION RESOURCE AREA RESOURCE MANAGEMENT PLAN AND ENVIRONMENTAL IMPACT STATEMENT

Dear Mr. Littrell:

The purpose of this letter is to submit comments on the above referenced draft resource management plan and environmental impact statement (Draft RMP-EIS).

As stated, the Draft RMP-EIS"....identifies public land that would be available for potential sale or exchange to consolidate ownership for improved management...." (page 11, Draft RMP-EIS). The Grand Junction Resource Area contains numerous small isolated tracts (parcels) of public land which have been recommended for disposal as summarized in Table 2-18 and shown on Maps 3, 4 and 5 of the Draft RMP-EIS. It is agreed that, "Many of these isolated disposal tracts cannot be used by the general public because there is no legal access. Administrative efficiency would be improved by disposal of these isolated tracts which are uneconomic to manage" (page 57, Draft RMP-EIS).

262 The RMP-EIS should also indicate that disposal of these isolated tracts will not only benefit the management efficiency and economics of the Bureau of Land Management (BLM), but will also benefit the management efficiency and economics of the private landowner(s) by allowing consolidation of the isolated public land parcels with the adjacent private land. Also, disposal of these isolated parcels in areas proposed for industrial development will allow for optimal use of the land as outlined in the planning criteria for land tenure adjustments. (Refer to page 20, Draft RMP-EIS.)

Numerous small isolated tracts of public land are located in the northeast portion of the resource area where several shale oil projects are proposed to be developed. (Refer to Final Mobil-Pacific Oil Shale Environmental Impact Statement, Final Environmental Impact Statement Clear Creek Shale Oil Project,

and Final Environmental Impact Statement Getty and Cities Service Shale Oil Projects.) These shale oil projects have indicated the need to purchase, exchange, lease and/or to obtain rights-of-way across the public land parcels. Except for Chapter 3 (Affected Environment, page 119), the Draft RMP-EIS does not acknowledge the requested public land actions.

The Draft RMP-EIS identifies locatable minerals, mineral materials, coal, oil and gas, etc., as issues and management concerns to be analyzed. The Draft RMP-EIS does not identify oil shale as an issue or a management concern. Therefore, oil shale resource and development is not adequately considered in the evaluation of the alternatives. The oil shale industry in the Grand Junction Resource Area would be impacted if adequate rights-of-ways across public lands, leases of public lands, and/or land tenure adjustments could not be obtained.

303 The Draft RMP-EIS does not adequately explain how the alternatives were developed and how the emphasis areas for each alternative were determined. Why are there no emphasis areas for oil shale development? (Refer to pages 25, 68 and Appendix A, Draft RMP-EIS.)

263 What criteria were used (area, resources, location, etc.) to identify and segregate the small isolated tracts of public land for disposal or retention for each alternative? It does not appear that objective methods were used to identify the disposal tracts for each alternative. Please explain the criteria and procedures used. (Refer to page 55, Maps 3, 4 and 5, Draft RMP-EIS.)

264 The phrase, "All public lands for disposal would be in the best interest of the public..." (paragraph 5, page 55, Draft RMP-EIS) is poorly written. Does this mean that disposal of public lands identified would be in the best interest of the public?

265 It is assumed that "Public land identified for retention...." (first complete paragraph, page 56, Draft RMP-EIS) means the public land not identified as disposal tracts on Maps 3, 4 and 5. It is also assumed that this sentence means that the BLM could exchange public land not identified for disposal in order to improve management efficiency or to meet the needs under the Recreation and Public Purposes Act. Are these correct assumptions?

266 How were the area and the number of disposal tracts for each alternative selected and determined? Will the "Land Tenure Adjustment Recommendations" become decisions in the Record of Decision on the RMP-EIS, or will the recommendations remain as recommendations? Please define. (Refer to Table 2-18, page 56, Draft RMP-EIS.)

267 In Tables A-1 and A-2 (Appendix A, Draft RMP-EIS) land tenure should also include acquisition tracts that could be exchanged for the disposal tracts.

304 The Glossary should define the following terms: oil shale withdrawal, land tenure, activity plan for land tenure adjustment, locatable minerals, and mineral materials.

In a letter to the District Manager, Grand Junction District, BLM, dated March 11, 1985, Pacific (Sohio Shale Oil Company, Cliffs Oil Shale Corp. and the Superior Oil Company) applied for the purchase of the following five parcels of public land for use by the Pacific Shale Project as analyzed in the Final Mobil-Pacific Oil Shale EIS:

268

		Acres
Parcel A		
Township 6 South, Range 98 West, Sixth P.M.		
Section 11:	Lot 1	40.00
Parcel B		
Township 6 South, Range 98 West, Sixth P.M.		
Section 23:	SW¼SW¼SE¼NW¼	2.50
	W½W½NE¼SW¼	10.00
	W½NW¼SE¼SW¼	5.00
	NW¼SW¼SW¼SW¼	2.50
	NE¼SE¼SW¼SW¼	2.50
Parcel C		
Township 6 South, Range 98 West, Sixth P.M.		
Section 15:	Lot 7, Part of Tract 96	10.04
Parcel F		
Township 6 South, Range 98 West, Sixth P.M.		
Sections 27 and 34:	Tract 1178	60.00
Parcel H		
Township 7 South, Range 98 West, Sixth P.M.		
Section 2:	Lot 4	40.28
	S½N½NW¼	40.00
	SW¼	160.00
	SW¼SE¼	40.00
Section 3:	Lot 1	40.22
	Lot 2	40.15
	Lot 3	40.07
	S½NE¼	80.00
	SE¼NW¼	40.00
	W½SE¼	80.00
	SE¼SE¼	40.00
Section 10:	N½NE¼NE¼	20.00
	SE¼NE¼NE¼	10.00
Section 11:	NE¼NE¼	40.00
	W½NE¼	80.00
	NW¼	160.00
	NE¼SW¼	40.00
	E½NW¼SW¼	20.00
	SE¼SW¼	40.00
	W½SE¼	80.00
	SE¼SE¼	40.00

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Mr. Forrest Littrell
July 1, 1985
Page 4

Parcels A and B are entirely surrounded by property owned by Pacific. Parcels C and F are surrounded by Pacific property on three sides and by other private property on the fourth side. Parcel H is bordered by Pacific property on the north and east sides. Access and utility corridors for several shale oil projects are proposed to be located adjacent to the southern and western borders of Parcel H.

268 All five of the public land parcels are shown on Maps 1 through 5 in the Draft RMP-EIS. On Map 3 (Commodity Alternative), all five parcels are identified as "Emphasis (d-Disposal) tracts". On Map 4 (Protection Alternative), all parcels except Parcel H are identified for disposal. On Map 5 (Preferred Alternative) parcels A and B only are identified for disposal. The Preferred Alternative in the RMP-EIS should identify not only parcels A and B but also parcels C, F and H for disposal. The Preferred Alternative does not appear to be based on the environmental analysis developed for the Commodity Alternative and the Protection Alternative as stated on page 236 of the Draft RMP-EIS.

The dispostion of these five public land parcels would be in compliance with BLM statutory and regulatory responsibilities to manage the public land resources. The parcels are small and isolated which precludes efficient and economic land management. Four of the five isolated parcels cannot be used by the general public because there is no legal access. These isolated public land parcels could be exchanged for private land that lies within or adjacent to large blocks of public land or could be exchanged for private land that has special resource values needed by the BLM to improve resource management. Or, these public land parcels could be sold, and with the monies from the sale, the BLM could purchase private land that has been identified for acquisition.

Pacific appreciates the opportunity to comment on the Draft RMP-EIS and appreciates your consideration of the comments in preparing a Final RMP-EIS. If you should have any questions in regard to this letter, please contact me personally at your earliest convenience.

Sincerely,

Truman E. Louderback

Truman E. Louderback
Project Engineer, Environmental
On behalf of Pacific

TEL:lm

38

June 30, 1985

Frosty Littrell, Area Manager
Bureau of Land Management
764 Horizon Drive
Grand Junction, CO 81506

Re: Draft Grand Junction Resource Management Plan--
Protection Alternative

Please include these comments in the hearing record.

Dear Mr. Littrell:

The Protection Alternative of the Resource Management Plan is essentially sound. BLM should be congratulated on the production of a Resource Management Plan which is far better attuned to wilderness protection and the safeguarding of various scientific, archaeological, recreational, and other interests. It is much improved over such recent efforts as the San Juan/San Miguel Resource Management Plan and the Glenwood Springs and White River BLM wilderness recommendations. The comments below reflect support for the Protection Alternative of the Resource Management Plan.

I have no argument with the following recommendations: the wilderness designations and boundaries for Black Ridge Canyons and Sewemup Mesa; the six Research Natural Areas; the identification of semiprimitive, non-motorized recreation in the Granite Creek, Hunter/Garvey Canyons, and Bangs/Rough Canyons; and the withdrawal from mineral development of the Colorado River corridor in Ruby and Horsethief Canyons.

205 I punt, however, urge BLM toward the protection as wilderness of The Palisade. These canyon-type ecosystems are inadequately represented in the national wilderness system and the allegedly unmanageable off-road vehicle use in this area should not dissuade BLM in its protection of The Palisade.

203 I also oppose the deletion of roughly 20,000 acres from the Dominguez Canyons area wilderness recommendation for the prevention of trespass onto adjacent private land. BLM is charged by the federal government with the protection of public, not private, land; it is unjustifiable to withdraw these acres. The owner(s) of these private lands are themselves primarily responsible for their protection.

204 The Demaree Canyon and Little Bookcliffs Wildhorse Areas must also be given wilderness protection, not only to preserve their wildlife, but to provide wilderness opportunities for the citizens of nearby Grand Junction. The existing wilderness areas of this state, as shown by the recent study of economist Richard Walsh, will cease to accommodate recreational pressures in roughly 25 years, especially near Colorado's more populous cities. These two roadless areas in the larger Bookcliffs region should be

38

-2-

204 given wilderness protection to attempt some kind of balance between wilderness and the 350,000 acres to be subjected to oil and gas leasing in the BLM proposed plan.

My own interests in this are essentially altruistic. I do not want to "lock up" these lands for my own pursuits. It is only the exploitative alternatives for these lands which lock them up, usurping the options of future generations. A now-or-never greed occupies the land and excludes everything else. The reason we still have as many options as we have on both public and non-public lands is that no one before us squandered all of nature's legacy. When you leave the wild lands as you inherited them, you leave all the options for those who follow.

The enemies of wilderness find it incredible that anyone would see value in something that does not immediately create wealth or confer power. That is one of the tragedies of our age. I, and most of the people I know, in various walks of life, feel a strong need to know that there are places that are still free, are still right. Why should someone in the eastern part of Colorado care for lands in the western part? Because there are people in board rooms far removed from this state altogether who view these lands and see only profit-and-loss statements. Wilderness belongs to us all--and to the future.

Sincerely,

Robert E. Schreiner, Jr.

Robert E. Schreiner, Jr.
1440 E. Quincy Ave.
Englewood, Colorado 80110

39

William Jeffries Green
13635 Butterfly Lane
Houston, Texas 77079
713/461-5034

Mr. Frosty Littrell, Area Manager
Bureau of Land Management
764 Horizon Drive
Grand Junction, Colorado 81506

June 26, 1985

Dear Sir:

Despite the fact that I do not presently live in Colorado, I keep up with matters concerning both conservation and development of wilderness resources in Colorado especially, and all western states and the nation generally. I am a long time member of the Colorado Mountain Club, an avid wilderness camper/hiker/climber and have lived much of my life in Colorado - Grand Junction, Denver, Glenwood Springs and Estes Park. I am 60. I am a petroleum geologist. The purpose of this letter is to offer some comments on The Grand Junction Resource Management Plan.

I fully appreciate the need for both protection and production - protection of our scenic, recreational and, if you will, spiritual resources while at the same time providing for development and production of resources to supply the needs of people - fuels, metals, construction materials, employment, food, clothing, etc. Protection and production are for the most part mutually exclusive in any given area and your unenviable job is to select and administer the areas so designated. Fortunately, our vast natural commodity resources can supply our needs from a relatively minor part of our even more vast wilderness resources. Thus, you have the opportunity to protect virtually all of the good and best wilderness areas for us now and for all future generations. It is to be hoped that we can pass on to those future dwellers in our such blessed land not only the legacy of the protected areas themselves, but the understanding and will to preserve such areas forever.

I am familiar with each of the areas concerned in the Grand Junction Resource Management Plan, having hiked, camped, explored, hunted, fished, photographed and otherwise enjoyed all of them. Based on information now available to me, I would like to comment as follows:

Black Ridge Canyons - I am pleased to learn that your recommended plan will protect this area.

205 The Palisade - This is an outstanding scenic area which is highly desireable to protect from desecration by vehicle access or development of any kind, and left alone to recover from such damages as have already occurred.

Letter to Littrell
Page 2
June 26, 1985

Sewemup Mesa - in many ways similar and of equal value to the Palisade. I understand that your recommendation is to protect this area as wilderness, which I support.

203 Dominguez Canyons - a fine area to include as wilderness. My information is that you would not include some 20,000 acres along the Gunnison and I would respectfully oppose such deletion.

204 Book Cliffs areas - so close to town, so wild, beautiful and unique. It would be a pity to permit any commercial exploitation of the few small remaining natural areas which are now under consideration for wilderness designation. I strongly oppose anything but wilderness for the Little Book Cliffs - Wildhorse - Demaree Canyon areas.

177 The fantastic Dolores River below Gateway should be protected from mineral development. Such protection would seem to be in line with other riverway protection already proposed by BLM.

Finally, I commend you on your generally balanced approach to land management, especially your understanding of the real need for wilderness protection as well as for various special-interest areas. Good luck in your hearings and deliberations.

Yours very truly,

W. J. Greer

WJG/pav

[illegible]
2210 Cliff St.
Boulder, CO [illegible]
June 30, 1985

Forest Littrell
Bureau of Land Management
Grand Junction Resource Area
764 Horizon Drive
Grand Junction, CO [illegible]

Dear Sir:

I have reviewed the draft resource management [illegible] environmental impact statement for the Grand Junction resource area, and submit, for the record, the following comments concerning the protection of sensitive natural resources and wilderness recreation.

First, I would commend the BLM staff for including the following considerations and recommendations in the preferred alternative:

Wildlife
1) Adequate considerations such as road retention and protection of riparian habitat.
2) Including the Colorado Natural Areas Program in preparation of habitat management plans for special management areas.

Wilderness
BLM's recommended as preliminarily suitable for wilderness designation:
1) Black Ridge Canyons
2) Black Ridge Canyons West
3) Dominguez Canyon
4) Sewemup Mesa

Special Management Areas
Resource Natural Area designations:
1) Adobe Canyon
2) Fruita Paleontological Site
3) Rabbit Valley Paleontological Site

Generally, the preferred alternative is excellent concerning recommendations for wildlife, wilderness, and Special Management Areas. However, I would support including the following items in the preferred alternative:

205 Wilderness
Recommend wilderness designation for the Palisade [illegible]. "Configuration, steep slopes, and potential treasure" are the criteria listed in the draft EIS (pg. 106) for the nonsuitable designation. Listed as they are in the draft EIS, (without site specific information), I find these criteria rather ambiguous. Even assuming that are completely correct, I would support the conservation alternative (pg. 30). In which 30,[illegible] acres are recommended for wilderness

205 designation. (As I understand this alternative, problems with configuration and treasure are mostly resolved.)
As for the "steep slopes", I believe that enhance the wilderness qualities of this [illegible], even though in places they make for difficult access and cross country travel. I find this an odd reason to disqualify a [illegible]. Steep slopes on the high mountains of Colorado did not disqualify Forest Service [illegible]'s from being recommended for wilderness.

111 Special Management Areas
Recommend the Federal and Cryptantha elata site as an ACEC or RNA.

Land Tenure Adjustments
256 Recommend retaining Shinarump Island in BLM ownership if the Colorado Division of Wildlife does not have an interest in a purchase or land trade.

I want to commend the BLM staff for its amount of effort put into the RMP. And I appreciate the opportunity to comment.

Sincerely,

Mike Figgs

Mike Figgs

June 30, 1985

Fresby Littrell, Area Manager
Bureau of Land Management
764 Horizon Drive
Grand Junction, Colorado 81505

Dear Sir:

A few weeks ago I had the opportunity to backpack into the Little Dominguez Canyon area. It is a strikingly beautiful area that is well deserving of wilderness status to preserve the wildlife, mineral formations, and the cultural or archeological resources.

203 I strongly support wilderness designation for the Dominguez Canyons with the inclusion of the original nearly 65,000 acres. Since there would be no satisfactory way to differentiate between the actual wilderness and the proposed 'buffer zone', it does not appear appropriate to delete more than 21,000 acres from the original proposal for such a purpose.

I sincerely hope you will find the Dominguez Canyon area worthy of wilderness designation and will oppose the deletion of any of the acreage for use as a buffer zone on the grounds that it would be a waste of our limited wilderness resources.

Thank you for your attention.

Sincerely,

Julie J. Studer

Julie J. Studer
207 Conferosa Drive
Alamosa, Colorado 81101

42

Amoco Production Company
Denver Region
1670 Broadway
P.O. Box 800
Denver, Colorado 80201
303 830-4040

Roberta Andersen
Public Lands Coordinator

July 1, 1985

Mr. Forest Littrell
Grand Junction Resource Area Manager
Bureau of Land Management
764 Horizon Drive
Grand Junction, CO 81506

Dear Frosty:

Amoco Production Company is a subsidiary of Amoco Corporation, formerly Standard Oil Co., (Indiana). Amoco's Denver Region personnel are responsible for exploring for and producing oil and gas resources in the western United States. Of prime importance is the federal mineral estate in the western states; hence our interest in federal land use planning. We appreciate the opportunity to comment on the draft RMP/EIS for the Grand Junction Resource Area.

We want to congratulate you and your staff on an exceptionally thorough, well-written document. You have shown that it is possible and logical to plan for both surface and subsurface resources, even though existence of subsurface hydrocarbon resources is largely unkown. We applaud your decision to consider energy interests throughout the RMP/EIS, and appreciate that management decisions show legitimate attempts to resolve potential resource conflicts.

Amoco supports the Commodity Alternative under which no lands with high [geologic] potential would be closed to leasing, with a minimum number of acres leased with NSO stipulations. Amoco has long had a commitment to protection of surface resources in all phases of exploration, production, and reclamation. We believe we can operate with minimal and temporary surface disturbance in accordance with standard design practices set forth in Appendix C. In this regard, we believe, as you have stated, that it is appropriate to consider all proposed developments case-by-case instead of blanketing all proposals with unnecessary restrictions.

It is our hope that those who read this document will take the time to understand how many environmental protection measures are routinely built into public land leasing and permitting processes. Too often it seems members of various publics see an oil and gas lease as a "license to destroy." We believe that the detail incorporated in the document will do much to alleviate unjustified fears if readers will take the time to read the oil and gas sections.

This resource area has a very high-quality resource mix, including known producible energy and mineral resources. Management of all resources, including recreation, under the commodity alternative will insure appropriate production in harmony with appropriate protection. Keeping options open for management opportunity is especially important in the Grand Junction Resource Area.

Thank you again for the opportunity to comment.

Sincerely,

R. Andersen

RAisd

43

BOARD OF COMMISSIONERS
DELTA COUNTY, COLORADO

District No. 1 Roger M. Blouch
District No. 2 Norman F. Kalmeier
District No. 3 Charles V. Hallenbeck

1 July 1985

Forrest Littrell
Bureau of Land Management
Grand Junction Resource Area
764 Horizon Drive
Grand Junction, CO 81506

Dear Mr. Littrell:

The Delta County Board of Commissioners has reviewed the Draft Environmental Impact Statement on the Grand Junction Resource Management Plan and appreciates the opportunity to offer our comments. The Board supports the Bureau of Land Management's Preferred Alternative, for recommendation of the Dominquez Canyon WSA to Congress for designation as wilderness. We concur

224 that overall this area exhibits unique characteristics which should be preserved as best possible in their natural state. It is our understanding that this wilderness designation will not in anyway affect the future planning or development of the proposed Dominquez Reservoir Project.

The Commissioners ask your consideration of Delta County's support to this alternative in preparing the final Resource Management Plan.

Sincerely,

Roger M. Blouch
Chairman

RMB:ak

COUNTY COURTHOUSE 501 MAIN AND PALMER, DELTA, COLORADO 81416 PHONE (303) 874-7591

44

July 2, 1985

Frosty Littrell, Area Manager
Bureau of Land Management
764 Horizon Drive
Grand Junction, CO 81506

Dear Mr. Littrell:

This letter concerns BLM's Resource Management Plan for the Grand Junction Resource Area.

I am very pleased with the recommendations for wilderness of the Black
84 Ridge, Sewemup and Dominguez Canyon WSA's. However, the deletion of the Domarse Canyon and Little Bookcliff areas disturb me. With continued oil and gas exploration in the Bookcliffs in the area north of Grand Junction, the remaining wildlife is going to be placed under increasingly heavy pressure. Exploration roads open the areas to increased recreational use and many animals will be forced to leave their home range. With the entire Bookcliff area open to drilling, there is no place left for the wildlife to flee. I urge you to reconsider your preferred alternative and set aside Domarse Canyon and the Little Bookcliff areas from further drilling exploitation. Existing leases could be purchased by BLM to stop planned development.

The management of Ruby Canyon as Wild and Scenic and the removal of the Canyon from surface site drilling is commendable.

256 In the RMP, riparian areas are identified as being in short supply yet the preferred alternative makes no provisions to protect the riparian areas of Skipper's Island. The possibility of changing the status of Skipper's Island to include protection of the area deserves careful consideration and review.

85 The sections concerning wildlife lack specific plans for dealing with wildlife. Are these plans to be developed at a future date? Detailed plans should be presented in the RMP to enable public input. Otherwise many long range plans for wildlife may be implemented without public knowledge. Please clarify BLM's plan for wildlife. The protection alternative urges wildlife management with an emphasis on non-game species as well as "more economically attractive species". The preferred alter-
86 native emphasizes game species only. Overwhelming emphasis is placed on the game animals by governmental agencies, while public support for non-game species is evidenced by the tremendous success of Colorado's state tax check off program. Please consider non-game species in your planning. Ecosystems do not consist solely of deer and elk herds.

263 The plans for land disposal are also very vague. Please clarify the means of identifying land for disposal, how land will be disposed of, and criteria for selecting land desirable for acquisition.

44

Mr. Frosty Littrell
July 2, 1985
Page Two

In closing, I would like to commend you on the RMP. BLM seems to have done their homework. With the few exceptions noted above the plan seems to be fairly well balanced between development and conservation. Although, sacrificing the entire Bookcliffs to oil and gas would be very detrimental.

Thank you for your time.

Respectfully,

Timothy Armstrong

45

July 2, 1985

EARL W. Williams
P.O. Box 1281
Palisade, Colo. 81526

Frosty Littrell, Area Manager
Bureau of Land Management
764 Horizon Drive
Grand Junction, Co. 81506

Dear Mr. Littrell:

As a concerned citizen I would like to document on your (BLM) recent "Resource Management Plan". Generally I support anything that helps protect areas as Wilderness or primitive etc. I do support, mostly, the Protection Alternative.

203 I feel there should be no deletions for the Demaree Canyon proposal of 79,935 acres. Irreparable damage to public lands is or is not going to happen irrespective of wilderness designation since there are areas inaccessible and unused by the public.

I support your recommendation from Sewemup Mesa.

205 I would encourage you to designate the Palisade as wilderness, all motor vehicles can be managed & should be managed. They have enough areas as is!
Little Bookcliffs Wilderness Area and Demaree Canyon Area. I feel, should be increased to Wilderness areas.

180 I would encourage you to include Northwest Corner in Unaweep Canyon with Granite Creek, Hunter/Garvey Canyons, and Bangs/Rough Canyons.

177 Please include the Dolores River, downstream from Gateway, for full protection. I like the SW Research Natural Areas: Hackett Peak, Rough Canyon and Unaweep Seep/Lake Canyon Grasslands. Thanks!

Sincerely,
Earl Williams

46

ROBERT O. BYRON
ATTORNEY AT LAW

GRANGER AVENUE
CASPER, WYOMING
82601

July 1, 1985

Mr. Forest (Frosty) Littrell
Area Manager, Grand Junction RA
Bureau of Land Management
764 Horizon Drive
Grand Junction, CO 81506

Dear Mr. Littrell:

You are to be commended for your commitment to excellence in researching and writing the Grand Junction Northwest and Southwest Quadrant "Draft Resource Management Plan and Environmental Impact Statement". While there are many special management considerations, it is clear that subsurface resources have been thoroughly considered. It appears energy interests have been taken into account throughout the RMP/EIS and decisions have been made based on legitimate attempts to resolve management conflicts.

It appears to me the Grand Junction RA has set a standard which we hope will be copied throughout the BLM in its planning process.

Sincerely,

Robert O. Byron

ROB/dc

47

July 29th, 1985
P.O. Box 3344
Telluride, Co. 81435

Frosty Littrell, Area Manager
Bureau of Land Management
764 Horizon Drive
Grand Junction, Co. 81506

Dear Mr. Littrell:

I am written to you concerning your draft on the Grand Junction Resource Management Plan which contains wilderness recommendations for over 750,000 acres of wilderness.

As a frequent visitor to Colorado from Oregon, I find some of these areas are so beautiful I cannot believe your hesitation at immediately preserving them. I strongly in favor of the Protection Alternative that you have suggested, and especially in the following areas.

Please give Sewemup Mesa wilderness status as it is one of the few ungrazed mesa's left in the West.

Please make greater efforts to rename the Palisades area as a wilderness as it is one of the most ecologically diverse in Colorado. Save it!

204 Please do not think of leasing the Little Bookcliff areas above Grand Junction to oil and gas companies. The proximity to town will be invaluable in the years ahead when people wish to experience solitude in a roadless area.

I agree with your assessment of combining Black Ridge and Black Ridge West by elimination the road between them. Good for you.

203 The Demaquez canyons should include all of the 79,935 acres without deletions this area is the largest/SE in the state and has an abundance of archaeological, ecological, and faunal diversity. It can never be replaced once you let it go. Do preserve it.

and finally the Demaree Canyon is home to lots of wildlife and should remain so. They also have needs and rights to a place to live, free of any more pressure than is already placed upon them.

180 I would like to comment you upon the suggested semi-primitive, non motorized recreation areas. Excellent idea, but please also include Northwest Creek, in Unaweep Canyon along with Granite Creek, Hunter/Garvey Canyons, and Bangs, Rough Canyons.

177 I support your proposal to withdraw Horsethief and Salt Canyons from mineral development. This will greatly help protect this river but you should also do the same for the Dolores River.

I also strongly approve of your six research natural areas.

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204 I know that in these times of increased energy pressure, as a land manager you are in a stressful position, but I urge you to hold on to what little wilderness that we do manage and to at least set aside however and the little "pockets" roadless areas. To not open everything in the "pockets" to mineral development. It is time this country looked at alternative forms of energy development such as solar and wind. Please do not give in to mismanagement of our precious natural resources.

Sincerely,

F. Tom Grimsley

48

conoco

[illegible]
Public Lands Coordinator

Conoco Inc.
[illegible] 17th Street
Denver, CO 80202
(303) 291-6123

June 28, 1985

Mr. Forest Littrell, Area Mgr.
Grand Junction R.A.
Bureau of Land Management
764 Horizon Drive
Grand Junction, CO 81506

Dear Frosty:

Re: Grand Junction
[illegible]

I want to express my complete support for The Grand Junction DRMP/EIS Preferred Alternative.

This is a refreshingly good plan. Care and thought have been taken in its research and presentation. It achieves rare balance in giving attention and visibility to all resources with no one resource dominant. To its credit it identifies Management direction without tying down to inflexible prescriptions. In the oil and gas portion, for example, I heartily agree with this one often-repeated sentence: "...may be waived or reduced in scope if circumstances change, or if the lessee can demonstrate that operation can be conducted without causing unacceptable impacts on the concern(s) identified." This is rich management at its best, appropriately assigning responsibility to the operator in terms of performance standards rather than prescribed design standards.

The Grand Junction RA is a complex area of conflicting uses--wilderness, good quality wilderness, good oil and gas prospects, good scenic and natural values, fragile soils, and some good wildlife values. The plan succeeds in recognizing all these values with a correct level of attention to each. Excellent use is made of ACEC, NSA, and VRA designations in tailoring the appropriate level of protection to various resources. The transportation system makes sense. The plan is economically correct--the anticipated expenditures are realistic and sensible.

I find it unique to write comments which do not criticize; almost always there are pieces of a DRMP which are not well put together. In your case, however, I think you've got a perfect "10" in your Preferred Alternative.

48

Mr. Forest Littrell
Page 2
June 28, 1985

You should resist any pressures to dilute that.

Yours very truly,

[signature]
(M. Fred Birdsall)
Public Lands Coordinator

cc:
CC:
A. Pratt
NWRCA

BSA File #2007

49

Mr. Richard D. Clark
967 - 25 Road
Grand Junction, Co. 81505
June 28, 1985

Mr. Forest Littrell, Area Manager
Bureau of Land Management
Grand Junction Resource Area
764 Horizon Drive
Grand Junction, Co. 81506

Dear Mr. Littrell,

It seems in today's world of restrictive legislation that many citizens pressure governmental agencies on the enemy of the people. I, too, must confess finding myself entrenched in such thinking at times. Our nation was founded on the principles of individual freedom, and it appears to many of us that each freedom we are being sent almost on a daily basis. This attitude is particularly prevalent in Western Colorado as many residents have fled high population areas anticipating the better life offered here with its attendant freedom.

I am also a refugee from the "Malignant Mass of Sprawling Humanity" (California) and have resided in the Grand Valley for 11½ years of "Life, Liberty, and the Pursuit of Happiness". I have also experienced the "Collective Intelligence of California Mentality", as more and more areas were closed to various recreational uses due to misuse and population encroachment. Because of this experience, my sensitivity towards any land use restrictions is acute and I tend to overact.

As knowledge of the Resource Management Plan for the Grand Junction Resource Area reached me, I, as expected, overreacted and planned to make an immediate run at myself at the public meeting. There was a brief moment of enlightened thinking that saved the day and (even though my interest was high) I avoided the public meeting. There is a tendency for such meetings to be as a shouting match, perhaps because when mouths open, ears tend to close. Encouraged by my brief moment of enlightened thinking, I encountered further revival and contacted your area office in Grand Junction, and had the good fortune of being introduced to Mr. Taylor Reynolds, your Recreation Planner.

49

Page 2 Clark, Richard D.

My major area of concern is the desert between the Highline Canal and the Bookcliffs. This area has long been a high-use area for both ORV and shooting. Mr. Sauvajot indicated that your office has received 95 complaints involving ORVs in the area. People only seem to write or contact when they are unhappy. If every time a person went out in that area and had a good time, he wrote the BLM letter about the pleasant experience, you would probably have several thousand letters thanking you for your existing land-use situation. There is a certain fraction of the population that simply doesn't like ORV [illegible] use.

I realize that ORV use in the area is abused by people and I do not discriminate the [illegible] abuse of this, but considering the total possible contacts between various users in the area, [illegible] frequent seem excessive. I have noticed that motorcycle [illegible] Caterpillar Tr. Penfield and Rue to the close location of the major highway, this area should probably be restricted or closed to ORVs and possibly restricted or closed to shooting.

Mr. Sauvajot has taken considerable time and effort in meeting the persons and landowners involved in the Resource Management Plan. I would like to take a moment to commend Dallas for his willingness to be helpful and his professional manner. He has done a lot to restore my confidence in government officials.

Mr. Sauvajot has shown me in considerable detail his Talcott Sportsman area concept, used only for ORV intensive use and the [illegible] used closure of Mt. Garfield to ORV and shooting. It is my initial impression that I can support the proposal. However, I would like to go on record encouraging as much open land to all uses as possible.

Sincerely yours,

Richard D. Clark

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Connelly Exploration Inc.
[illegible]
Denver, Colorado [illegible]

Thomas M. Connelly, President Telephone [illegible]

July 2, 1985

Mr. Wright Sheldon, District Manager
Mr. Forest Littrell, Resource Area Manager
Bureau of Land Management
764 Horizon Drive
Grand Junction, Colorado 81506

Re: Resource Management Plan and
Environmental Impact Statement

Gentlemen:

As a leaseholder, I wish to thank both of you for your commitment in researching and writing the above document.

Your Resource Area has set a standard which we hope will be emulated throughout the Bureau of Land Management in its planning process.

Yours very truly,

CONNELLY EXPLORATION INC.

TMC:ha

Thomas M. Connelly, President

51

United States Department of the Interior
FISH AND WILDLIFE SERVICE
COLORADO FIELD OFFICE
730 SIMMS STREET
ROOM 292
GOLDEN, COLORADO 80401

IN REPLY REFER TO:

July 2, 1985

MEMORANDUM

TO: District Manager, Bureau of Land Management
Grand Junction, CO

FROM: Assistant Field Supervisor, Ecological Services
Lakewood Suboffice, Golden, CO

SUBJECT: Review of Draft Grand Junction Resource Area
Resource Management Plan and Environmental
Impact Statement

We have reviewed the March, 1985 draft Resource Management Plan (RMP) and Environmental Impact Statement (EIS) for the Grand Junction Resource area. Prior to receipt of this document, the FWS provided comments relative to the RMP at an April 18, 1984 interagency meeting, and via written comments dated May 22, 1984, February 4, 1985 and February 22, 1985. It appears, that many of our earlier comments have not been incorporated in the draft RMP. However, because of our concern for the fish and wildlife resources of the Grand Junction Resource area, we reviewed the RMP quite extensively and once again offer comments for your consideration, many of them a reiteration of those previously made. We believe the final RMP should incorporate these comments, or provide sufficient explanation for their omission. This memorandum also includes comments from our Endangered Species Office in Grand Junction.

General Comments

242 A major concern of this document are the lands to be disposed of under land tenure. Many of the lands proposed for disposal would fall under BLM's designation of "Category 1, Retention Areas." Of particular interest to us are the seven parcels proposed for disposal along the Colorado River downstream from Fruita, Colorado. Of the seven, six of them (414, 415, 416, 431, 432, and 433) include flood plain areas and valuable riparian habitat and, therefore, should not be considered for disposal under Criterion 11, Category 1, Page 19. As you are aware, we have prepared a Fish and Wildlife Coordination Act Report in connection

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242 with the Bureau of Reclamation's Grand Valley Unit of the Colorado River Basin Salinity Control Project. This report recommends that the Bureau of Reclamation purchase or acquire and develop lands along the Colorado River to the Fruita to Loma area to mitigate wildlife habitat losses associated with this project. These seven parcels, along with additional private lands, are an integral part of this mitigation package. In addition to disposal of these lands, we have serious concerns about the validity of trying to dispose of the following lands in relation to Category 1 classification:

All of the following are from Map 5, Preferred Alternative:

269 CO 24, 31, 10, 17, 420, 421, 422, 423, 426, 427, 429. Disposal of these areas appears inconsistent with Criterion 12 and 19 because they are adjacent to Forest Service lands.

270 CO 418, 414, 415, 431, 432, 433, 419, 181, 180, 190, 201, 208, 216 ,217, 430. Disposal of these areas appears inconsistent with Criterion 10, 11, 12, 13 and 14.

In addition, many of the other areas provide critical big game winter ranges (Criterion 16) and should not be considered for disposal.

182 We note on Page 120, Table 3-8, that the Jerry Creek Reservoirs are listed as sport fisheries water in the Grand Junction Resource Area. This designation is surprising in view of the fact that efforts to get this area opened for sport fishing have been ongoing for the past 20 years. We believe you should clarify this point and expand on what you propose will happen to the Jerry Creek Reservoirs in the future. As you know, we have continually asked that you uphold the decision made by the Interior Board of Land Appeals on April 21, 1980, and provide the public the right to access this area for fishing. We are concerned that this issue was not discussed in the RMP, especially since it comes up for five-year review. Last year, we still believed that there are no compelling reasons why these two reservoirs built on public lands are not opened for public fishing.

87 We noted that there is considerable discussion about management of riparian areas throughout the document. However, proposed management indicates that "woody riparian habitat would be delineated to favor the tallest native plant species." We questioned this management philosophy in our earlier letter and still question why the management of vegetative understory of riparian areas (essential to riparian habitat value) is not considered as a major management goal. Proposed management guidance could be satisfied by a cottonwood forest suffering from overgrazing. We believe the management guidance for riparian habitats and wetlands in the preferred alternative should ensure the maintenance or enhancement of the vegetative and faunal diversity that would occur in the absence of man's activity.

290 We found very little narrative related to access acquisition proposals from the Preferred Alternative Map 5. We believe access to presently unavailable BLM lands should be a top priority within this management plan. We noted that several of the areas that are proposed for access

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acquisition are already open to the public. We trust that you intend to prioritize your acquisition based upon current access conditions.

291 Access Acquisition Proposal 35. The road from the Fruita Reserve to Snyder Flats may need some coordination with the Forest Service. An access road to Snyder Flats is definitely needed; however, the Forest Service is proposing to close the road within the forest boundary which currently provides access to the road you propose to acquire.

Section 7 of the Endangered Species Act (ESA) describes the interagency cooperation that must occur to ensure that any action authorized, funded, or carried out by a federal agency is not likely to jeopardize the continued existence of any federally proposed or listed, threatened or endangered species. However, we have found no language describing this process. While most of the emphasis areas include threatened and endangered species as a management criteria, the consideration is

119 usually a time of year restriction or buffer zone, active management commitment, or admission of a need for stipulations. None of the comments recognize the need for BLM to make a no effect/may affect judgment for each of the individual listed species that may be associated with each action. We believe the RMP should provide more detail relating to BLM's obligations pursuant to Section 7 of the ESA. Completion of the RMP/EIS does not obviate BLM's Section 7 responsibilities. Section 7 therefore must be satisfied for each action authorized by the RMP/EIS.

The threatened and endangered species management criteria included in the emphasis areas incorporate time of year restrictions and buffer

120 zones to minimize potential disturbance to golden eagles, peregrine falcons, prairie falcons and other wildlife. Our May 22, 1984 comments asked that until site specific buffer zones can be established in coordination with the FWS, buffer zones for all raptor nests should be 1/2 mile rather than 1/4 mile. However, the buffer zone in the draft RMP continues to be 1/4 mile. We again request that this be increased to 1/2 mile until more specific guidance can be developed in coordination with the FWS.

The draft RMP includes coal as a management criteria for the emphasis

28 areas. FWS provided comments relative to the Coal Unsuitability Criteria on February 4, 1980 and February 22, 1980 (copies attached). Generally FWS disagreed with BLM's application of the unsuitability criteria according to the RMP. BLM's proposed management of the coal resource in the Grand Junction Resource Area has not changed as a result of FWS's comments. We again ask, therefore, that BLM modify its application of the Coal Unsuitability Criteria to incorporate our previous comments.

Specific Comments

119 Page 17, Wildlife Management, 3. This section should stipulate that consultation with the FWS will occur for each individual action that BLM determines 'may affect' a federally listed threatened or endangered species.

121 Page 34, Threatened and Endangered Species: There is no explanation in the document as to how these acreage figures were quantified (see comment for Page 17).

122 Page 43, Threatened and Endangered Species Management, Proposed Management Actions. What are summering bald eagles?

123 Page 43, Effects: This entire section implies that BLM will allow threatened and endangered species to decline. Regardless of which alternative is selected, threatened and endangered species in the RMP area receive protection through the Section 7 consultation process. We do not believe it is appropriate to state that one alternative will provide less protection to endangered species than another.

124 Page 44, Table 2-20. How were acres quantified?

256 Page 45, Effects, Column 1, Paragraph 1, last sentence. Disposal of Skipper's Island appears to be inconsistent with Criteria Numbers 11, 13, and 14 under retention areas Category 1, Page 19. We recommend Skipper's Island be proposed for ACEC designation (Table 2-17).

271 Page 58, Implementation, Column 2, Paragraph 3. As stated earlier, the Bureau of Reclamation (BR) is planning to acquire lands along the Colorado River as mitigation for the Grand Valley Salinity Project. Therefore, BR should be included within this paragraph.

300 Page 61, Table 2-20, Threatened and Endangered Species. How were these numbers quantified? Are these acres?

125 Page 66, Table 2-23, Threatened and Endangered Species Management. How were these acres quantified?

126 Page 70, Threatened and Endangered Species. The Dolores skeletonweed is not a federally listed species. Throughout the document there are many references to species as threatened and endangered which are not (e.g. golden eagle, prairie falcon, great blue heron). To avoid repetition we will not make this comment again, but ask BLM to make appropriate corrections wherever such errors occur. Without knowing what specific

120 activity is going to occur, we do not believe a buffer zone of 1/4 mile is adequate to protect peregrine falcons. Please see our General Comments relating to buffer zones. To avoid repetition, we ask BLM to change all buffer zones for raptors to 1/2 mile wherever 1/4 mile is mentioned in the documents.

121 Page 70, Oil and Gas. The need for stipulations implies that impacts may occur to threatened and endangered species. If so, Section 7 consultation with the FWS would be required. To avoid repetition, we have not made this comment in numerous other areas where it applies.

121 Page 77, Threatened and Endangered Species. This comment implies that impacts may occur to endangered species. If so, Section 7 consultation would be necessary.

127 Page 78, Threatened and Endangered Species, Column 1. February 13 to July 1 is not consistent with other areas within the document or BLM's Unsuitability Criteria Appendix B Criterion 13. We ask that the dates be consistent wherever they occur, and that windows be at least as restrictive as recommended by FWS in previous comments.

128 Page 79, Threatened and Endangered Species, Column 2. Where are the 20,280 acres? What criteria were used to determine this number? We believe any occupied prairie dog burrows should be considered potential black-footed ferret range.

300 Page 79, Public Utilities, Column 2. The source of the 14,770 acres figure should be indicated.

129 Page 80, Threatened and Endangered Species, Column 2. How does the BLM intend to provide suitable habitat in the Colorado River for restocking of endemic fish?

87 Page 83, Wildlife, Column 1 and 2. You state "woody riparian habitat would be maintained to favor the tallest native plant species." How would this be accomplished, by overgrazing? Here again, and as we stated under the general comments, we believe management for a single species is unacceptable from a wildlife management perspective.

130 Page 84, Threatened and Endangered Species. How does the BLM intend to provide the suitable habitat for these endangered species?

272 Page 90, Area 5d. These emphasis areas lack a threatened and endangered species management criteria. How will threatened and endangered species issues be resolved for these areas?

131 Page 90, Threatened and Endangered Species, Column 2. No mention was made to this section of the Colorado squawfish. The criteria for black-footed ferret habitat is occupied prairie dog burrows.

88 Page 91, Wildlife, Columns 1 and 2. We commend your proposal to protect and improve approximately 3,000 acres of riparian habitat. However, why is the goal to manage this habitat for at least an upper seral state? We believe all stages of riparian habitat are important.

89 Page 91, Livestock Grazing, Column 2. Making the statement that "no new livestock trails would be permitted in riparian areas..." is quite interesting. The methods proposed to carry out this management objective should be described. As we have stated before, the best thing that could happen to the 3,000 acres of riparian habitat from a wildlife standpoint would be to remove man's influence (which includes livestock grazing) from those areas completely.

Page 92, Wildlife, Column 1. Your statement that "A location would be identified for a 30 to 60-acre reservoir and marsh to provide habitat for resident and migrant wildlife" is excellent. We believe that the BR may be able to construct just such a reservoir as mitigation for the Grand Valley Salinity Project. We suggest that a meeting with the appropriate officials from your staff, BR, Colorado Division of Wildlife and my staff to discuss this issue would be worthwhile.

132 Page 95, Threatened and Endangered Species. 'Active management' that results in beneficial impacts to threatened and endangered species would require Section 7 consultation with the FWS. To avoid repetition, we have not made this comment the minimum of seven other times it would be appropriate. How will the BLM provide this suitable habitat?

89a Page 97, Coal, Column 2, Paragraph 2. As we stated previously, we believe the 162,860 acres identified as "sensitive" to coal development should be correctly identified as unsuitable with exceptions.

133 Page 100, Threatened and Endangered Species. The federally listed species mentioned here receive protection from the ESA. No other 'special protective designation' that BLM can provide should be indicated.

130 Page 102, Threatened and Endangered Species. The method of providing suitable habitat for peregrine falcon should be described.

183 Page 108, Recreation, Column 1. The Mesa County Sheriff's Department has already defined areas closed to shooting. If you have not already done so, you should coordinate the no shooting zones proposed in the RMP with the Mesa County Sheriff's Department.

292 Page 108, Transportation, Column 2. The reason you plan to acquire access to areas which are already open (i.e. north end of 29 & 33 Roads and Mitchell Road) is not clear. It would seem a simple easement would be better. We also believe priority should be placed on acquiring access to areas that are presently blocked to public access (i.e. 9, 24, 25, 26, 29, 30, 31, 34, 35, etc.) from Map 5 access acquisition proposals.

134 Page 108-109, Land Disposal. We suggest that "management of wildlife" be included in this section unless it is intended to discourage wildlife use on these areas. This indeed may be the case since it is indicated that all these areas would be opened to off-road vehicles (ORV's). There are also threatened and endangered species issues that must be resolved for these areas.

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90 Page 127, Column 2, Paragraph 2. On Page 91 it is indicated that there are 3,000 acres of riparian habitat. However, on Page 127 it states there are 2,500 acres. This should be rectified.

91 Page 127, Column 2, Paragraph 3. The meaning of the statement - although grazing is having a diminishing effect and potentially can have a negligible impact" is not clear (emphasis added).

Page 128, Threatened and Endangered Species. See our General Comments regarding the ESA.

184 Page 128, Table 3-8. We question why the Jerry Creek Reservoirs were included as "Sport Fisheries Water" in the Grand Junction Resource Area and Cabin Reservoir was not included.

Page 129. We do not believe it is appropriate for BLM to rank the endangerment of the federally listed or candidate species. In Column 2 of this table, what do L, M and H stand for and what criteria were utilized to assign these letters? For Section 7 purposes, the whooping
135 crane flock in the resource area is not experimental. We call attention to the fact that there is evidence of razorback sucker reproduction. How can fish habitat be private or government property? Very little of the resource area has been surveyed for ferruginous hawks. However, we are certain there is more than one nesting pair.

Page 130, Table 3-9. The remarks about Phacelia submutica, "but not a collector's prize species," are inappropriate and seem to indicate a negative bias toward this taxon because of its small size and nondescript appearance. The value of this sensitive species lies in its uniqueness and the diversity it provides to the ecosystem, not whether it is esthetically pleasing based on relative human values. It is part of a unique ecosystem occurring on the Wasatch formation around DeBeque.

136 The Dolores skeletonweed or rushpink occurs on the Cutler formation around Gateway. It appears to be impacted by grazing. Many plants have been grazed down to ground level and most mature plants with flowers and seeds are restricted to patches of prickly pear cactus (Opuntia polyacantha).

137 The Harrington beard tongue does not occur in the Grand Junction Resource Area.

138 A new species, Astragalus debequaeus, has recently been described from the DeBeque area. It will be added to the USFWS candidate plant list in the next update. It should be added to Table 3-8.

92 Page 183, Impacts from Wildlife and Fish Habitat Management, Column 2, Paragraph 2. We are not aware of a population of sharp-tailed or sage grouse on Glade Park and question whether habitat improvement for these species would have much value. However, we believe establishing a viable population of sharp-tail and sage grouse on Glade Park would be desirable and request that you coordinate any proposed efforts with the CDOW.

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139 Page 154, Column 1. We know of no biological justification to maintain only the larger prairie dog towns for the benefit of the black-footed ferret. Any occupied prairie dog burrow is potential black-footed ferret habitat.

140 Page 156, Cumulative Impacts on Threatened and Endangered Species. This paragraph contradicts Page 43, Column 2, Effects.

Page 173, Impacts from Land Tenure Adjustments, Column 1. We are definitely opposed to anything which would reduce wildlife habitat and opportunities for public use.

141 Page 174, Impacts from Wildlife Management. The determination that increasing the carrion will increase the number of bald eagles by 10 is highly speculative and should be substantiated.

140 Page 175, Cumulative Impacts on Threatened and Endangered Species. This paragraph contradicts Page 43, Column 2, Effects.

Page 195, Impacts from Transportation Management, Column 1. We strongly support public access to those blocks of public land which are currently inaccessible.

Page 208, Column 1, Paragraph 2. We commend your proposal to improve the fisheries along 71 miles of streams.

Page 208, Column 2, Paragraph 2. The last word in this paragraph should be changed from "games" to "goals."

93 Page 208, Impacts from Wild Horse Management, Column 2. The statement is made that "Limiting herd size to a maximum of 120 horses would allow almost 10% of the critical deer winter range in the resource area to improve as wildlife habitat." Does this mean 90% will not be improved? We would rather see 100% of the wildlife habitat improved.

273 Page 209, Impacts from Land Tenure Adjustment, Column 1. Disposal of lands with critical winter range for deer or elk would be contradictory to Criteria 17 under Retention Areas on Page 20.

14 Page 209, Cumulative Impacts on Wildlife Resources, Column 2. The salinity control projects we're familiar with generally tend to reduce waterfowl resting areas by reducing wetland and riparian habitat. For federally sponsored salinity control projects we have requested mitigation to offset the project losses to wildlife.

94 We believe one of the most detrimental impacts to riparian stands is grazing. If grazing were eliminated from riparian areas, habitat would be greatly improved. For this reason we continue to question why BLM intends to manage for the tallest species in riparian areas. Managing for the tallest species would be best accomplished by overgrazing, which greatly reduces the value of riparian habitat.

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274 Page 210, Impacts from Land Tenure Adjustments, Column 1. You indicate that the 27,098 acres proposed for disposal would be acquired by private individuals. However, many of the tracts proposed for disposal fall under the various criteria described under Category 1 (retention areas), Pages 19-20. Most of these concerns have been expressed before but these areas include riparian habitat, flood plain, blocks adjacent to Forest Service lands, critical deer and elk winter range, and endangered species habitat and therefore should not be disposed of to the private individuals. In addition, the CDOW or other State, Federal or local government agencies should be given first opportunity to acquire these properties. Therefore, we hope that disposition of these acres would not result in private ownership.

142 Page 219, Table 4-5. The method used to determine that endangered species will benefit more by implementation of the preferred alternative than with the other alternatives is not explained. This table also contradicts Page 43, Column 2, Effects.

Page 220, Wildlife, Column 2. Although it may correct the statement that native wildlife habitat would decrease in area and quality under all alternatives is not a good prediction. We believe that reclamation and mitigation associated with project development could offset these losses. In addition, we believe BLM could take the initiative to monitor grazing activities, establish new habitat manipulation programs and protect riparian areas. Habitat quality could be improved in the long-term. However, it appears that from your prediction that BLM directions are to let wildlife suffer at the expense of development and poor management. If this is true, we believe some changes in policy are sorely needed.

143 Page 222, Threatened and Endangered Species. The implication that threatened and endangered species habitat will be lost contradicts the projection shown in Table 4-5.

Page 240, Appendix D. In our May 22, 1984 letter we dedicated two pages of comments to Unsuitability Criterion. Again, on February 4, 1985 we provided two pages of additional comments on Unsuitability. To our knowledge neither of these letters were used in the development of Appendix D of the RMP. Instead of reiterating the same comments on Unsuitability Criterion 9-14 in this letter, we request that you review the two letters we have provided. From these two earlier letters our major concerns are briefly:

89a 1. That we question your statement which indicate no areas within the Grand Junction areas are unsuitable for mining under Criterion 10-14.

89a 2. That the unsuitability criteria has no basis for using the term "sensitive." We believe the areas are either "suitable," "unsuitable" or "suitable with exceptions" for leasing.

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144 3. That raptor surveys need to be performed on all areas which have potential for leasing. Without these surveys the database for applying Criterion 9, 10, 11, 13 and 14 is highly suspect and the unsuitability application cursory at best for these criteria.

120 4. That the buffer zone should be 1/2 mile and not 1/4 mile.

145 5. That the timing for protection of raptor nests should be consistent. We recommend February 15 to July 1 for golden eagles, and March 15 to July 1 for falcons. The RMP recommends so many different dates it is difficult to apply. For example, under Criterion 11, golden eagle nest, Page 254-255, you recommend December 15 thru July 15 and throughout the narrative you recommend January 15 thru July 15. In one case on Page 78 you recommend February 13 thru July 1 for peregrines; while under Criterion 13, Page 255 you recommend February 15 thru July 15.

94a Many additional comments could be made on unsuitability, but we request that you refer to our May 22, 1984 and February 4, 1985 letters and respond to them as our official comments under this section.

146 Page 266, Section 2, Oil and Gas Lease Stipulations. There is no mention under this section of seasonal stipulations in relation to raptor nesting. As we have stated under the Coal Unsuitability, there should be no surface disturbances at any time and no surface occupancy within 1/2 mile of golden eagle nests from February 15 to July 15 and falcons from March 15 to July 1. Other raptors should also be provided 1/2 mile protection, such as accipiters (goshawk and Cooper's hawk) and ferruginous hawks. We recommend protection dates for these species from March 1 to July 15.

147 Page 282, Table F-4. Colorado River should include endemic fishes and riparian areas as "Key Species Emphasis."

148 Page 317, Threatened and Endangered Species. We do not believe it is appropriate to rank the endangerment of federally listed species. The razorback sucker is not listed as threatened or endangered. The razorback chub is not a recognized species.

Overall we felt that this RMP/EIS was very difficult to review. We were very disappointed that none of our earlier comments were included in its development. Because of the way it was written, i. e., each section similar to the one before, there were a tremendous number of errors; for example, prairie falcons and golden eagles being listed under threatened and endangered species category.

The "Preferred Alternative" appears to be the least damaging, however, we hope that some of our suggested changes are made before it is implemented. We were disappointed that there was no guidance in the plan relating to conflict resolution between management of various resources. Some areas are managed for off-road vehicles and others are

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managed for wild horses, but no areas were strictly managed for wildlife. This gives justification to statements on pages 43 and 220 that wildlife habitat within the resource area will decrease in area and quality over time. This is primarily because within this resource area, wildlife appears to take a back seat to development. This does not necessarily have to happen; in fact, wildlife habitat quality could be increasing with a limited amount of effort.

We hope that these comments will assist you in the identification of areas where wildlife concerns conflict with the alternatives as described. If we can be of assistance in clarifying our comments or resolving any of these conflicts, we would be anxious to do so.

Verna D. Hetting

Attachments

cc: CDOW, Denver
FWE/HR, Denver; Salt Lake City; Grand Junction

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WEXPRO COMPANY

70 SOUTH STATE STREET · P. O. BOX 11070 · SALT LAKE CITY, UTAH 84147 · 801 530-5555

ROLAND J. GILL, JR.
MANAGING ATTORNEY

July 10, 1985

Mr. Wright Sheldon
District Manager
Bureau of Land Management
764 Horizon Drive
Grand Junction, CO 81506

Dear Mr. Sheldon:

On behalf of Wexpro Company and Celsius Energy Company, we wish to express our appreciation to you and Frosty Littrell, as Area Manager, for the excellent job done in preparing the Draft Resource Management Plan and Environmental Impact Statement for the Grand Junction District. There were apparent problems and conflicts which required the cooperation of many people to resolve and your obvious teamwork resulted in a well written paper. We hope others in the BLM will follow your example.

Very truly yours,

Roland J. Gill Jr.

ckb

cc: Forest Littrell

RECEIVED
JUL 11 1985
GRAND JUNCTION RESOURCE AREA
GRAND JUNCTION, COLORADO

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AWA

American Wilderness Alliance

7900 East Arapahoe Road/Suite 114/Englewood, CO 80112/(303) 771-0380

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REGIONAL OFFICES
Wild America
7900 East Arapahoe Road/Suite 114
Englewood, CO 80112

July 3, 1985

Mr. Forest Littrell, Area Manager
Bureau of Land Management
764 Horison Drive
Grand Junction, CO 81506

Dear Mr. Littrell:

This is to comment on the Resource Management Plan and draft EIS for the Grand Junction Resource Area. Please include these comments in the official record on this subject.

The American Wilderness Alliance is a Western-based national non-profit organization whose members are working to conserve the nation's decreasing publicly owned wildlands, wildlife habitat and free-flowing rivers.

We are especially interested in the land-use allocation plans for the wilderness study areas, rivers and special management areas, as well as their associated wildlife, in the Grand Junction Resource Area. Many of our Coloredo members, as well as some members outside the state, have used and enjoyed these WSAs, other special management areas and the Colorado and Dolores rivers for wilderness and other non-motorized recreational purposes. They and members of our staff have a good knowledge of the areas and their resources.

We strongly support the Bureau of Land Management recommendation to designate Black Ridge Canyons and Black Ridge Canyons West as wilderness. We respectfully urge that the Black Ridge access road between these two areas and a few other unimproved ways which enter the areas be closed, and that some 74,000 acres be proposed by the BLM as a unified Black Ridge Canyons Wilderness.

We note that because of location and snow or rain and soil conditions, the Black Ridge access road is often impassable and consequently does not fully serve its purpose. It certainly does not justify the considerable maintenance required to keep it open even part of the time and should be closed. Hunters will adequately harvest the annual increment of mule deer in this area without a road and enjoy a high quality wilderness experience in the process. As hunters become aware of the quality hunt this area provides, they will enter the area on foot, horseback and by boat from the Colorado River and take their game out by the same methods.

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Working together to Conserve Wild America

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This outstanding area, with its numerous canyons, including Rattlesnake Canyon and the many magnificent arches, is home to bighorn sheep, mountain lions, and bald and golden eagles, as well as mule deer. " these species except the mule deer are especially sensitive animals requiring the remoteness from man and his works that wilderness affords. All would benefit from a wilderness classification of both areas. In addition, the bald eagle is nationally endangered and deserves all possible protection of its habitat.

Both units are wild, scenic and possess outstanding opportunities for solitude and a quality wilderness experience.

Moreover, Black Ridge Canyons and Black Ridge Canyons West are next to Colorado National Monument along a wild reach of the Colorado River, and wilderness designation for the two areas would complement and enhance the wilderness, wildlife and other natural values of both wild tracts, as well as those of the monument and the river. The reach of the Colorado River included in the BLM wilderness proposal is also recommended for designation as a National Wild and Scenic River. Wilderness status for this stretch of river would further strengthen protection of the river area. The river serves as important float access and unusual approach to the proposed wilderness.

The Black Ridge Canyons have often been mentioned as a possible enlargement of Colorado National Monument. But, if properly bounded and established as wilderness, the American Wilderness Alliance favors retention of the greater undeveloped area by the BLM.

We believe your Dominguez Canyon Wilderness proposal should include about 20,000 more undeveloped acres along the Gunnison River and Escalante Creek, for a total of approximately 74,000 acres. BLM's primary mission is to protect and manage BLM lands and not give major attention to whether trespass occurs on adjoining private lands. Some public trespass occurs now and can be expected to continue in the future, regardless of whether these additional 20,000 acres are designated as wilderness. Public education, access easements and posting of private lands should be used to reduce trespass. In any event, the problem of trespass should not be allowed to exclude and expose to development substantial outstanding public wildlands which would make a more complete natural ecosystem and viable wilderness.

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Mr. Forest Littrell, July 3, 1985, Page 3

The greater area is important habitat, as the BLM has observed, for elk, bighorn sheep, mountain lion, black bear, deer and wild turkey. All but the deer are wilderness-dependent species which would benefit from a wilderness classification. Also wilderness designation would enhance quality hunting of these species in season.

Domingues Canyon is highly scenic, affords exceptional opportunity for solitude and receives substantial wilderness recreational use. The area is of exceptional geological and archeological significance. Over 600 million years of geological history are exposed in the sedimentary and precambrian rock formations. Rich in fossilized bones of the Jurassic Period, the area has produced parts of the largest dinosaur ever found (ultrasaurus). All of these attributes add significantly to the value of Domingues Canyon for wilderness purposes.

The BLM should revise its wilderness recommendation to include the entire undeveloped area of about 76,000 acres.

We support entirely the BLM's wilderness recommendation for the 10,000 acre **Sowsnup Mesa** area. Here is a rare opportunity for the BLM to propose as wilderness an undeveloped mesa in the Southwest that is totally ungrazed by domestic livestock. Opportunities for solitude and unconfined recreation, including rock climbing, are superb. Mineral potential is low.

The American Wilderness Alliance respectfully requests that the BLM revise its recommendation to include the other three WSAs in the Grand Junction Resource Area for wilderness designation, as follows: **The Palisade**, 26,000 acres; **Little Book Cliffs**, 29,000 acres, and **Demaree Canyon**, 25,000 acres.

205 We feel that, in the long-run, wilderness and other natural values of **The Palisade WSA** are more important to the citizens of Colorado and the nation than off-road vehicle use, pinyon-juniper harvest and speculative oil and gas activities. Shape, steep slopes and potential trespass problems should not be used, as in the Preferred Alternative, to rule out a wilderness recommendation for this unusual wild area with its major opportunities for solitude and unconfined recreation. Potential for locatable minerals, oil and gas is low. Existing oil and gas leases in the area should be allowed to expire and not be renewed.

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Mr. Forest Littrell, July 3, 1985, Page 4

226 **Little Book Cliffs WSA** is close to Grand Junction and provides Grand Junction citizens with one of its few opportunities to enjoy wilderness nearby. It is only one of two possibilities left to designate wilderness in the entire Little Book Cliffs country. The WSA contains one of only three officially designated wild horse ranges in the United States, which can best be managed in an undeveloped condition for the well-being of the wild horses. The area has a very high degree of naturalness, is highly scenic and warrants wilderness designation. Coal, while apparently available in the area, can be found in much larger quantities elsewhere in Colorado, Utah and Wyoming.

222 **Demaree Canyon** is affected largely by the forces of nature, has outstanding opportunities for solitude and wilderness recreation, including hunting, and represents the only other remaining roadless area in the Book Cliffs vicinity that can be considered for wilderness. Demaree is home to the black bear, mountain lion and wintering mule deer, all of which would benefit from a wilderness classification.

180 The American Wilderness Alliance enthusiastically supports the BLM Preferred Alternative recommendation to manage the following for semi-primitive, non-motorized recreation: **Granite Creek, Hunter-Garvey Canyons** and **Bangs-Rough Canyons**. The wildlife of these units will benefit from these special management designations, as will quality non-motorized recreation. The BLM should also include **Unaweep Canyon** and **Northwest Creek** in this same type of administrative designation.

177 We strongly support the BLM's plan to withdraw the Colorado River corridor in Ruby and Horsethief Canyons from all mineral development, in order to protect this famous floatwater stretch for wild and scenic river status. We ask that the BLM extend the same plan to the **Dolores**, which has also been recommended for inclusion in the National Wild and Scenic Rivers System.

We likewise endorse the BLM proposal to establish the six Research Natural Areas.

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Mr. Forest Littrell, July 3, 1985, Page 5

In other respects, the American Wilderness Alliance supports the Protection Alternative, which gives the most protection to the superb natural values and wildlife habitat of the resource area.

Thank you for the opportunity to present these comments.

Sincerely,

Clifton R. Merritt
Executive Director

CRM:dbh

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THIS LETTER HAS BEEN REPRODUCED

Box 65
De Beque, Colo.
July 10, 1985

Forest Littrell
B.L.M.
Grand Jct. Resource Area
764 Horizon Drive
Grand Jct., Colo.

To whom it may concern:

In regards to comments on the Resource Management Plan and Environmental Impact Statement I would like to express mine as follows:

293 Being a livestock permittee in the North Dry Fork and Cow Mountain area, my comments pretain to the opening of a public access across private property to adjoining B.L.M. Along with the party that owns a large portion of this area (approx. 7 mi on N. Dry Fork & numerous acres on Cow Mtn.), I am definitely protesting any such action. Public access would disturb the performance of the livestock extremely on the private sector of this area as well as the B.L.M. Vandalism in the area would increase drastically along with the rustling of livestock and the poaching of wildlife. Speaking from the livestock and land tenant view points as well as being a tax payor, I feel it would be highly infeasible to purchase a right-a-way thru this area for public access due to the amount of private property and oil shale claims in the proposed route.

Yours truly

/s/ Tom Latham

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[illegible] F. Lucile Street
Seattle WA 98118
July 7, 1985

Grand Junction Resource Area
Bureau of Land Management
764 Horizon Drive
Grand Junction CO 81506

Dear Frosty and Staff:

Some belated, brief comments on your Resource Management Plan Draft:

As a contributor to the Citizens Alternative, I am happy to see many of our concerns incorporated into the Protection Alternative, the Alternative I favor. I applaud recommendation of all WSAs as Wilderness. I'm glad to see Black Ridge WSAs and Sewemup, a favorite area of mine, recommended for Wilderness in the Preferred Alternative as well. However, I hate to see Dominguez WSA trimmed, instead of expanded, along the Gunnison River. In my opinion it is highly doubtful that the problems with adjacent private lands would be solved by non-wilderness recommendation. Besides which, I feel that All of Dominguez WSA is fully qualified as Wilderness, and that's what should count. Already the public has lost to private interests part of its interest in access to the Dominguez area.

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Despite intense mineral development north of I-70, I still hope to see examples of the fine Bookcliffs wild areas protected. I'd also like to see the Scenic stretch of the Dolores River, below Gateway, protected by withdrawal from mineral development.

I wish I were closer by the fine country you manage so I could give you more support and comment. Recently I took a visit down to Oregon BLM's Steens Mountains, but their over 400 miles away! Some showcase though. Guess I have to settle for sailing lessons these days.

My very best to all of you.

Sincerely yours,

Jeanne T. Hemphill

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July 9, 1985

Frosty Littrell, Area Manager
Bureau of Land Management
764 Horizon Drive
Grand Junction, Colorado 81506

Dear Mr. Littrell:

The following comments on the Grand Junction Resource Area Draft Resource Management Plan/Environmental Impact Statement (RMP/EIS) are submitted on behalf of the Uncompahgre Group of the Sierra Club. The Uncompahgre Group has currently over 100 members in Mesa, Delta, and Montrose counties. Several of its members participated in the formation of the Citizen's Alternative which is mentioned in the RMP/EIS on page 109.

We found the document to be well written and the maps were excellent. Overall, I think you will find our comments to be supportive of your efforts in this planning document. We were pleased to see that although the Citizen's Alternative was not formally adopted as one of the alternatives, it was given consideration and many of the ideas contained in the Citizen's Alternative were adopted in the RMP/EIS.

The Uncompahgre Group of the Sierra Club (UGSC) would like to propose revisions to your Preferred Alternative (PA). We trust that you will consider these suggested revisions as you prepare the Final RMP/EIS and during subsequent reviews thereafter. Thank you for this opportunity to participate in the planning process for the Grand Junction Resource Area.

Sincerely,

Sharyl A. Kinnear

Sharyl Kinnear, Vice Chair
Uncompahgre Group of the Sierra Club
P.O. Box 1543
Grand Junction, Colorado 81502

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Comments on the Grand Junction RMP/EIS
Submitted by the Uncompahgre Group of the Sierra Club
July 9, 1985

Recreation

Overall, the PA illustrates good management ideas for recreation in the Grand Junction Resource Area. A few of our concerns are as follows:

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* UGSC likes the idea that Ruby Canyon has been withdrawn from mineral entry in the PA and will be managed under the scenic river guidelines. We would also like to see such a management prescription for the Dolores River below Gateway. As the BLM is aware, this section of the Dolores has also been recommended for Wild and Scenic River status. We would encourage a provision in the RMP/EIS that supports the notion of all identified wild and scenic river corridors being withdrawn from mineral entry.

* UGSC supports the management prescription in the PA to close Mt. Garfield to ORV use. The area outlined for continued ORV use appears to be ample. Mt. Garfield is an area deserving of protection, especially since it is the first area visitors are met with when they approach Grand Junction from the east.

* UGSC supports the Protection Alternative (ProA) for Granite Creek since it prescribes a management plan of semi-primitive, non-motorized recreation. The exception to the ProA would be the directional and interpretive signing which would be provided. We are not clear as to the intent of the signing and therefore, cannot support such a measure. We do not support the PA since we initially proposed that Granite Creek be recommended as wilderness. The ProA best protects the area and its wild values.

* Again, UGSC must concur with the ProA for the management prescription of South Shale Ridge as an Area of Critical Environmental Concern (ACEC). South Shale Ridge is a unique area and every effort should be taken to protect its scenic and unique geological values.

* UGSC supports the PA management for the Gunnison River Canyon. We support the no surface occupancy stipulation and the VRM II classification for the area.

* UGSC supports the PA for Hunter/Garvey Canyons. We are pleased with the non-motorized recreation stipulations for the canyons and the VRM Class II objectives for the canyons.

Uncompahgre Group of the Sierra Club
Grand Junction RMP comments
Page two

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* UGSC also concurs with the PA for the Sewemup Mesa area and the Bang's Canyon/Northeast Creek area. We support the VRM Class I designations for the cliffs in Sinbad Valley and the scenic cliffs and canyons of the Bang's Canyon/ Northeast Creek area.

* UGSC supports the PA for the Gateway area with the exception of the Palisade area. We support the ProA for the Palisade area since the ProA recommends that the Palisade be designated wilderness. As mentioned above, we would encourage the BLM to withdraw the Dolores River below Gateway from mineral entry.

Visual Resources Management

The Uncompahgre Group of the Sierra Club is in agreement with the VRM Class I and Class II objectives outlined in the PA. We feel that these objectives are workable. Under the category of Class I we would like to see the wilderness study area acreage increased to match that of the Protection Alternative.

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Wildlife

UGSC supports the PA in its wildlife management prescriptions. We were particularly impressed with the Threatened and Endangered Species lists contained in the RMP. The lists appear to be very thorough and will help guide the BLM during the plan implementation during the next ten years until the plan is reviewed.

Paleontological Resource Management

UGSC wholeheartedly supports the PA in its recommendation of the Rabbit Valley and Fruita Paleontological sites as research natural areas. These areas are extremely vital to the Grand Valley research and education concerning paleontological resources.

Land Tenure Adjustments

UGSC was pleased to see that under all alternatives in this section, "the primary emphasis for disposal would be on exchanges, and the secondary emphasis would be on sales." We support the notion of exchanges only, and in particular the exchange of public lands for private lands that would enhance the management objectives

of the BLM and provide protection of various special resource values. We also support the statement on page 137 of the RMP/EIS which states, "Current management emphasis under the land tenure program is generally to retain public land in federal ownership; therefore, no sale proposals are under consideration at this time". The list of examples of the types of private land considered for acquisition through exchange as seen on page 56 of the RMP/EIS is excellent.

The UGSC is concerned about the tracts which have been outlined for disposal. Our concerns are as follows:

248 • Tracts 17,18,24, and 31 are all adjacent to the Grand Mesa National Forest and as such should not be considered as isolated tracts of land for disposal.

243 • Tracts 419,420,421,422,423, and 424 are located in Unaweep canyon. This canyon is spectular for its scenic properties and is a favorite route for those of us on the west slope. UGSC encourages the retention of these tracts for their scenic values and integration with the Gateway IRMA as outlined in the RMP/EIS.

244 •Tracts 427 and 429 are crucial to the integrity of the incredibly beautiful Sinbad Valley/Roc Creek area and also to preserve the integrity of the Sewemup Mesa Wilderness area. UGSC also recommends that the BLM retain these tracts under any circumstances.

245 • Tracts 381,384, and 385 are located near the monument and would provide access to the monument. Access is a critical issue as illustrated during the BLM proposal to restrict access to the Dominguez canyon area 1 1/2 years ago. Several comments received by the BLM supported retention of public access for that particular area, thus it behooves the BLM to improve public access whenever the opportunity affords itself.

275 • Tracts 403,404,405,406,407, and 408 are all imperative since they are located in the Bookcliffs. BLM should retain as much public land as possible in this ecological sensitive area.

Wilderness

The UGSC supports the ProA since it affords the most protection of the Resource Area's wilderness resources. All seven wilderness study areas (WSA) represent a significant addition to the National Wilderness Preservation System. Lower elevation canyon and mesa areas of the Colorado Plateau are not as yet represented in the national system.

These areas are accessible for a greater portion of the year than are higher elevation wilderness areas. Wilderness use is growing at a rate which will overburden wilderness availability in less than 15 years. These areas should be protected for biocentric reasons as well as anthropocentric.

The BJ BLM should not hesitate to recommend that all seven WSAs be designated as wilderness especially since several observing areas in the Resource Area were "thrown out" in 1980 from further consideration as wilderness, e.g. Granite Creek, Hunter Canyon, Bang's Canyon, etc.

The following are specific comments concerning each of the seven wilderness study areas.

Sewemup Mesa

The UGSC agrees with the PA recommendation to designate Sewemup Mesa as wilderness. The UGSC has long recognized the suitability of the area. While leading a hike into the area this spring, mountain lion tracks were found and also peregrine falcons observed. Sewemup Mesa is perhaps the single most pristine area in the state, having been isolated from development due to its almost insurmountable cliffs. The mesa top is ungrazed, a rarity in western America. Unmatched scenery can be found in views of the LaSal Mountains to the west, the Sinbad Valley, and the length of the Dolores River Canyon.

Black Ridge Canyons and Black Ridge Canyons West

The UGSC also concurs with the PA in its recommendation of Black Ridge Canyons and Black Ridge Canyons West as wilderness. The inaccessible topography, magnificent geologic sculpturing, and rich wildlife of the Black Ridge Canyons make thee prime candidates for wilderness protection. The most notable feature of the area is its dozens of natural arches carved out of the Entrada Formation, so abundant that they are commonly considered to be the greatest such concentration of arches outside of Arches National Park.

The PA presents a well thought out plan for this area and definitely increases its manageability potential. Of special recognition are the PA's boundary adjustments. The inclusion of the area of land south of Ruby/Horsethief and located between Black Ridge Canyon and Black Ridge Canyon West presents a much improved boundary over the boundary recommended in 1980. The road along the Colorado Ridge which is closed in the PA is highly commendable. The closure will improve the integrity of the unit. At the hearing on the Draft RMP/EIS in Grand Junction several members of a rock hound club expressed their dismay over the road closure. The major concern of the rock hound club was that the Morrison formation would inaccessible by vehicle to their particular activity. It is felt

by the UGSC that the Morrison formation is readily accessible along thousands of miles of roads in the Morrison formation in the Grand Junction Resource Area. The wilderness attributes lost with the road remaining open outweigh the vast opportunities to rock hound elsewhere.

Again, the UGSC endorses the PA as an excellent plan to preserve Colorado's unequaled desert wilderness area.

203 Dominguez Canyon

The UGSC supports the PA with the exception of the boundary modifications. The UGSC does agree with the proposal to close the cherrystems into Big Dominguez Canyon and Long Mesa. However, the UGSC cannot condone the excision of nearly 19,000 acres from the PA recommendation for the Dominguez wilderness.

The BLM does not provide adequate reasoning for its exclusion of these 19,000 acres. The exclusion is supposed to reduce or eliminate trespass which may occur on adjacent private lands. The UGSC is of the opinion that topography would inhibit such trespass as would the trailheads proposed by the BLM for the area. Also, if trespass were occuring at the present time, creating a "buffer zone" for Dominguez Canyon would not eliminate that problem. The exclusion of these lands is not warranted and the UGSC urges the BLM to reconsider its position and include these areas in its wilderness recommendation in the Final RMP/EIS.

The Dominguez Canyons area is filled with a variety of scenic wonders, recreational opportunities, and scientific resources. As such, the BLM is to be commended for its wilderness recommendation for the area.

The Palisade

The Palidade area encompasses a tremendous variety of landforms and plant and animal life. The BLM recognized the attributes of the area when it recommended the designation of Outstanding Natural Area (ONA) for The Palisade in its PA. However, the UGSC proposes that The Palisade is deserving of a wilderness recommendation rather than the recommendation of ONA.

Almost 4,000 feet of vertical relief, ranging from river bottom to mountain heights, offer a range of natural characteristics few, if any, places in the United States can match. The Palisade itself is a narrow fin of sandstone surrounded on all sides by vertical walls of Wingate and capped by carved Entrada slickrock. The north slope of the fin provides shaded slopes for Douglas-fir, a species normally found at much higher elevations. The area also includes Unaweep Seep, the most outstanding natural botanical display in Colorado.

205 We are confused as to the rationale outlined on page 385 of the RMP/EIS where the BLM states," Configuration, steep slopes, and potential trespass problems prevented the unit from being

205 recommended for wilderness in this alternative". The UGSC has yet to see a non-wilderness recoomendation due to "steep slopes". Configuration and potential trespass problems can be solved with boundary adjustments and right-of-way acquisitions. The BLM has devised poor rationale for non-inclusion of The Palisade into the National Wilderness Preservation System; therefore, the UGSC would ask that the BLM reverse its decision on The Palisade in the Final RMP/EIS.

Demaree Canyon

The UGSC supports the ProA for Demaree Canyon. Demaree Canyon is unique in the respect that together with the Little Bookcliffs WSA it is the only pristine, roadless area in the Bookcliffs range.

The diverse ecosystem provides habitat for many species of wildlife including predators such as mountain lions, bobcats, and coyotes. During the winter, herds of deer and elk migrate through the northwestern portion of the area.

227 On page 321 of the RMP/EIS it states," Outstanding opportunities for primitive recreation are not found within the unit." The UGSC led an outing to Demaree and would disagree with the BLM's comment on page 321. Climbing out of the canyons and onto the high ridges surrounding the canyons provides one with spectacular views of the Uncompahgre Plateau, La Sal Mountains, and the lower Grand Valley. The UGSC urges the BLM to protect this unique area and feels that the areas uniqueness outweighs the oil and gas potential of the area. Oil and gas activity can occur elsewhere in the Bookcliffs; therefore, the UGSC urges purchase of existing pre-FLPMA leases or alternate methods of tapping the resource such as slant drilling or helicopter access.

Little Bookcliffs

The UGSC supports the ProA for the Little Bookcliffs. As was mentioned above, the Little Bookcliffs along with Demaree constitutes such of the remaining roadless area in the Bookcliffs range. This uniqueness coupled with its many other attributes proauts the UGSC to urge the BLM to reverse its decision on the Little Bookcliffs.

Views from the cliffs of the WSA are just one of the many outstanding recreational opportunities within the four major drainages which dissect the plateau. The area is habitat for severa. species of wildlife including wild horses from the Bookcliffs Wild Horse Range, one of only three such ranges in the United States.

Concerning the pre-FLPMA oil and gas leases, the UGSC defers to the comments which will be subsitted by the Sierra Club Legal Defense Fund.

The pre-FLPMA coal leases are on the boundary of the wilderness boundary and thus, should be exchanged for other coal leases elsewhere. The wilderness attributes that will be lost to coal far outweigh the development of those few coal leases.

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Box 57
Glade Park, Co 81523
July 6, 1985

Forest Littrell
Bureau of Land Management
Grand Junction Resource Area
764 Horizon Drive
Grand Junction, CO 81506

Dear Mr. Littrell:

Mountain Island Ranch appreciates the opportunity to comment on the Bureau of Land Management's draft Resource Management Plan and Environmental Impact Statement for the Grand Junction Resource Area. As we hold several grazing leases and own land within the boundaries of the Western portion of the resource area south of the Colorado River, the proposed RMP/EIS is of great importance to us.

Mountain Island Ranch is currently with cooperation from the Colorado and Utah BLM in the process of initiating the Savory Grazing Method (SGM) to the leased and fee lands in Utah and Colorado. The implementation and success of this method of livestock grazing requires some flexibility in the previously established allotment management plans. As this method is new and still in its infancy, much is to be learned from its effect to the individual segments of the environment with planning, monitoring, and control being the keys to success. It is becoming more apparent that this method of management will restore much of the range, creating better habitat for the wildlife, and would be very much in tune with the concept of wilderness. We hope within the scope of the proposed RMP/EIS, there will be no factors limiting the implementation of SGM.

In general, we support the Preferred Alternative Action for the Resource Area, but offer the following comments and suggestions.

229 WILDERNESS-We concur with the establishment of the Black Ridge Wilderness Area as proposed. We currently do not foresee any major conflicts between

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229 either livestock grazing on our allotments within the proposed wilderness boundary, nor with the implementation of SGM. The technique we are using in the implementation of SGM requires no internal fencing, and limited use of motorized vehicles or equipment. Wilderness is compatible with our method of management. As utilization of the entire allotment depends on the availability of adequate livestock water, provisions need to be made in the establishment of the wilderness to provide for the development and maintenance of these facilities. Currently, several projects are in various stages of completion and repair, and in the future, they will need to be completed and/or repaired. The language used in the protection alternative regarding livestock grazing in the wilderness areas is more specific regarding construction and maintenance of livestock water. This language should be adopted in the final RMP/EIS.

SOILS AND VEGETATION COVER-As indicated in Table 3.5 page 124, one-third of the vegetation is in poor condition and almost one-half is in fair condition within the entire resource area. Current erosion rates range from 0.2 to 10 tons per acre per year as stated on page 114. The RMP/EIS appears to be deficient in development of solutions and management criteria to mitigate soil erosion and improve vegetation. The management of the soil and corresponding 8 vegetative cover is imperative to the long term success of both the implementation of the final RMP/EIS and the management of the other segments of the affected environment, eg. water, wildlife, visual resources, livestock grazing, etc. Without soil and adequate vegetative cover, desertification of a major portion of the resource area is probable.

THREATENED AND ENDANGERED SPECIES-As there are several prairie dog towns within Area K-I, the RMP/EIS should allow for the introduction of the black footed ferret within this area.

VISUAL RESOURCES-Granite Creek Canyon is proposed to be managed for its

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195 scenic natural values, eg. VRM Class II objectives and is listed among the areas which have a high visual resource management importance. Proposed vehicle travel in the Granite Creek area is to be restricted to existing roads. Currently there is a vast network of roads and trails in the area, which if vehicle travel is allowed to continue, could severely destroy the visual resource being managed for. Means of implementing restrictions and enforcement of vehicle use need to be addressed, especially if the visual resource of the area is to be protected. There is also a need to demarcate through signing or other means, the ownership boundary line between private and public land to resolve problems of trespass in the Lost Horse Basin/Granite Creek Area.

LAND DISPOSAL-Mountain Island Ranch recommends the addition of the following lands for disposal as they are small isolated tracts of land with no public access. These include:

Township 14 South, Range 104 West
Section 2: N1/2 NE1/4
Township 13 South, Range 104 West
Section 35: all/4 SE1/4
Township 12 South, Range 103 West
Section 13: SW1/4 SW1/4
Section 23: N1/2 NE1/4 and SW1/4 NE1/4 and SE: 4 NW1/4

276 All of the above lands are listed for disposal in the Commodity Alternative. In addition, we concur with the inclusion of Tracts 343, 334, 332, and 333 for disposal as indicated on the Preferred Alternative map.

TRANSPORTATION ACCESS-As indicated on Table 2-19 pages 58 & 59, administration access for forestry purposes is sought for Timber Ridge and Snyder Flats North. As both of these proposed accesses are across fee land owned by Mountain Island Ranch, we are amenable to allow personnel from the BLM to use our private roads for administrative purposes, but do not extend that privilege to the general public. Haystack Mountain and the Little Dolores accesses should remain deleted as indicated in the Preferred Alternative portion

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of the above mentioned table.

Thank you for this opportunity to comment on this proposal. Please include this in your official record.

Sincerely,

Miles Keogh

Miles Keogh, Manager

MKick

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BOARD OF COMMISSIONERS
DELTA COUNTY, COLORADO

District No. 1: Roger M. Blouch
District No. 2: Norman F. Kahmeier
District No. 3: Charles V. Hallenbeck

July 11, 1985

Forrest Littrell
Bureau of Land Management
Grand Junction Resource Area
764 Horizon Drive
Grand Junction, CO 81506

Dear Mr. Littrell:

On July 1, 1985 the Delta County Board of Commissioners wrote you a letter of support regarding the BLM Preferred Alternative concerning approval of the Domingues Canyon WSA. In doing so, the Board acted upon specific assurance that no substantial objections had been made by present users.

In fact, the Board has recently learned that substantial objection has been raised by Musser Ranches, of Delta, Colorado (copy enclosed).

Until and unless the specific objections referred to in the Musser letter are addressed, and rectified to the satisfaction of the parties concerned, the Delta County Board of Commissioners by action taken July 8, 1985, hereby rescinds its support and approval of the Domingues Canyon WSA Preferred Alternative.

Please keep us advised of your response to the objections raised by Musser Ranches.

Very Sincerely,

Roger M. Blouch

Roger M. Blouch, Chairman
Board of County Commissioners
Delta County

RMB:cac

cc: Mesa County Commissioners
Musser Ranches

RECEIVED
JUL 15 1985
GRAND JUNCTION RESOURCE AREA
GRAND JUNCTION, COLORADO

COUNTY COURTHOUSE FIFTH AND PALMER, DELTA, COLORADO 81416 PHONE (303) 874-7595

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colorado open space council
2239 E. Colfax Ave. Denver, CO 80206 355-0466

Mark Pearson
P.O. Box 284
Grand Junction, CO 81502

July 9, 1985

Frosty Littrell
Area Manager
Grand Junction Resource Area
Bureau of Land Management
764 Horizon Drive
Grand Junction, CO 81506

Dear Mr. Littrell:

Enclosed are the comments of the Colorado Open Space Council on the Draft Grand Junction Resource Management Plan and Environmental Impact Statement.

The Colorado Open Space Council (COSC) endorses the Protection Alternative as it affords the most complete protection for dwindling resources such as wilderness while still allowing for more than adequate development of mineral resources. The Protection Alternative incorporates many of the features of the "Citizens' Alternative", which COSC helped to produce and coordinate. BLM is to be thanked for its consideration of the Citizens' Alternative in the preparation of the RMP.

The RMP as a whole is undoubtedly the best effort yet produced by a BLM planning team in Colorado. The recommendations with respect to visual resources, special management areas, off-road vehicle use, river management, and recreation carefully take into consideration the thrust of our concerns. The specificity of each management emphasis area, with its thorough detail of plans for each of the many resources, is particularly appreciated. Apart from the actual recommendations in the RMP, the editorial staff is to be complimented on the readability of the document. Considering the complexity of an RMP, the editors have done an admirable job of organizing information, presenting it in a format pleasing to the eye, and providing the right mix of thoroughness and number of topics. For example, the section on Affected Environment was extremely informative without overwhelming the reader with unnecessary detail. The selection of graphics - maps, charts, and tables - also greatly enhanced the readability of the RMP.

The rest of our comments concern the specific recommendations in the RMP.

"Humanity belongs to earth, not earth to humanity"

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WILDERNESS

230 COSC's comments on wilderness should be considered with some historical perspective in mind. The Grand Junction Resource Area has already dropped from wilderness study in previous stages of the wilderness review more than 170,000 acres scattered amongst 18 areas. These areas deleted included such stunningly spectacular areas as Granite Creek, Bangs Canyon, and Hunter Canyon - areas any uninitiated, impartial observer would not have hesitated to have deemed suitable for thorough study as potential wilderness. Unfortunately, through the vagaries of the wilderness review and the inherent biases against wilderness within any agency oriented toward output of salable products such as minerals, cows, and timber, these indisputably deserving areas never really got a fair chance at an even-handed wilderness review.

Now, because BLM has previously thrown out of the wilderness review process everything except the absolute jewels such as Black Ridge and Dominguez, BLM is reluctant to recommend as suitable for wilderness more than the absolute minimum of the choicest of the gems. The most spectacular portion of the Bookcliffs, Little Bookcliffs WSA, and a portion of two of western Colorado's most spectacular canyons (Unaweep and Dolores River). The Palisade WSA, are deemed unsuitable as wilderness because otherwise it would appear as if too much is being recommended for wilderness, irregardless of the vast acreages previously discarded. BLM should review its decision on Little Bookcliffs in light of it being only one of seven potential candidates in the Bookcliffs region rather than one of two, and its decision on The Palisade in light of it being the only sample of Unaweep Canyon left in the wilderness review after Bang's Canyon and West Unaweep were dismissed.

What follows are our comments on BLM wilderness recommendations of what remains of the more than 400,000 acres once studied.

Black Ridge Canyons -- COSC enthusiastically endorses BLM's recommendation for Black Ridge Canyons. BLM's proposed decision recognizes Black Ridge as Colorado's premier desert wilderness candidate due to its precipitous slickrock canyons, uncommon landforms, abundant desert wildlife, magnificent river canyon, and refreshing solitude.

Several features of BLM's recommendation merit particular commendation. The inclusion of the triangle of land between the two Black Ridge WSAs provides a continuous wilderness river shoreline for over 15 miles and will thereby enhance the primitive river-based recreation opportunities available in the area. BLM's closure of roads into the unit, particularly the "Colorado River Road" which splits the two WSAs, as well as the road between Mee and Knowles Canyons, is a critical component of the wilderness recommendation. Closure of these roads, along with closure of the other shorter spurs into the area, will forestall future

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wilderness management problems by greatly reducing the effective miles of road bordering the area and will work to preserve the solitude within the core of the area. In sparse pinyon-juniper forest such as comprises the uplands of Black Ridge Canyons, these road closures are the most certain means of preventing unauthorized and inappropriate off-road vehicle use. With this in 208 mind, BLM should give serious thought to pulling the road closure on the Ute Trail road to the arches back up to the top of the hill where it turns off from the Black Ridge Hunter Access road. There has been a fair amount of vehicle use off of this road. Pulling the closure farther up the hill will also enhance the wilderness setting of the arches in Rattlesnake Canyon.

There has been concern by vehicle user groups (i.e.,rockhounds) that closing the Colorado River Road in particular will create undue hardship on those users. There are many hundreds, if not thousands, of miles of roads through the Morrison Formation of western Colorado, the formation in which rockhounds find petrified wood, fossils, agates, etc. The very thing which makes Black Ridge uncommon is its relative lack of roads through the Morrison Formation mesa tops. It seems there are abundant other opportunities for vehicular-based rock collecting in the region as compared to the wilderness values of Black Ridge Canyons that will be enhanced due to this closure.

The geography of Black Ridge offers a distinct variety of levels of recreational access. The eastern canyons of the area, Devil's, Pollack, and Flume, are easily and quickly accessible from Grand Junction. Yet the major canyons in the western part of the area, such as Mee and Knowles, are much more difficult to access and provide correspondingly greater levels of solitude. The proposed road closures will help to preserve the solitude of these western canyons in the core of the area by limiting the proximity of vehicular access.

Seweup Mesa -- BLM's recommendation of Seweup Mesa as suitable for wilderness is warmly welcomed. Seweup Mesa possesses all of the prerequisite wilderness attributes - stunning scenery from atop any of the cliffs surrounding the mesa, unparalleled solitude, and one of the most untouched mesa tops in Colorado. We have always considered Seweup Mesa to be one of the real treasures entrusted to BLM. We are greatly pleased that BLM has not betrayed that trust and has recommended Seweup Mesa for wilderness designation.

231 BLM has skimped on its description of wildlife within Seweup Mesa. No mention is made in the RMP of any of the wildlife present in the area. Peregrine falcons use the area for hunting, and it is undoubtedly suitable, if not actual, nesting habitat for these as well. Mountain lions have also been seen in the area.

Dominguez Canyons -- The partial wilderness recommendation for Dominguez Canyons WSA is, as BLM might expect, partially welcomed. We appreciate that BLM has determined that the wonderful recreation, wildlife, and archeological values of the

areas are best protected through wilderness designation. We strongly endorse the proposed closures of the two cherrysteee into the area, that up Big Dominguez Canyon and that out Long Mesa, as they serve no necessary purpose. However, we strongly disagree with BLM's deletion of over 25% of the area, or almost 20,000 acres.

The boundary deletions along the Gunnison River and Escalante Creek concern us most. One of the primary attributes of the WSA is that it encompasses portions of a major desert river and its canyon, namely the Gunnison. Dominguez Canyon WSA affords protection for a substantial portion of an entire watershed, from high on the plateau all the way to the Gunnison. To stop short of actually including the river bank of the river and to leave the boundary on a ridge high above the river is truly unfortunate.

Apart from the aesthetics of the boundary, BLM is proposing a land mangement scheme for the deleted lands that Congress has shown an unwillingness to accept. BLM is apparently proposing to create a "buffer zone" of de facto wilderness outside of the recommended boundaries of Dominguez Canyon. BLM is doing this so as to accommodate local landowners, and would presumeably continue to manage the deleted lands in a manner compatible with wilderness. Yet, in Section 118 of the 1980 Colorado Wilderness Act (PL 96-560), Congress stated that it

203 "does not intend that designation of wilderness areas in the State of Colorado lead to the creation of protective perimeters or buffer zones around each wilderness area. The fact that nonwilderness activities or uses can be seen or heard from areas within the wilderness shall not, of itself, preclude such activities or uses up to the boundary of the wilderness area."

Because of this language, we are uncertain that BLM could protect the deleted lands in the manner most compatible with the adjacent wilderness lands. What BLM has essentially done in shrinking the wilderness boundaries is to further shrink the protected heart of the proposed wilderness. The buffer needs to be within the recommended wilderness, not outside of it. The deleted lands along the Gunnison and Escalante Creek should be restored for this reason.

We are also not convinced of any need for deletion of these lands on the basis of potential trespass problems. Placing the wilderness boundary on a ridge as opposed to the valley bottom seems an irrelevant solution to trespass problems. If trespass is occurring now, it will continue to occur irrespective of whether the boundary is near the road or on the ridgetop as people will continue to go where they will. Trespass in these particular areas seems a remote possibility in any case, as the RMP itself states that signed trailheads for the proposed wilderness will be created at Dominguez Campground, Bridgeport, and Gunnison Gulch. Extremely few people will head out into the wilderness from areas

203 other than these designated trailheads. What it boils down to is that BLM has sacrificed many thousands of acres of prime wilderness to assuage the paranoid fears of a few.

We take great umbrage with the proposed deletion of 2600 acres from the wilderness recommendation on the basis of pinyon-juniper woodlands conflicts. It is apparent that BLM has recommended for wilderness only that portion of Dominguez Canyons WSA for which it can find no other use. If any other use is possible, that use apparently takes precedence. It astounds us that firewood overrides wilderness protection for the largest and 232 one of the most spectacular WSAs in Colorado. There are many thousands of acres of firewood areas across the Uncompahgre Plateau; BLM has no justification for sacrificing the few portions of upland forest in the WSA to that purpose. Even in the immediate vicinity of the WSA there is abundant firewood. There is no reason to complete the deforestation of the Long Mesa area that chaining started by removing the upland forested areas of the WSA from the wilderness recommendation.

Little Bookcliffs Wildhorse Area -- There seems to be little doubt in either our minds or BLM's mind that Little Bookcliffs possesses outstanding wilderness attributes that merit its inclusion in the National Wilderness Preservation System. BLM, however, is stymied in its willingness to recommend the area as suitable for wilderness due to the existing mineral leases. BLM has apparently thrown up its collective hands with respect to the pre-FLPMA leases as BLM repeatedly emphasizes in the RMP the existence of the leases and BLM's inability to do anything to prevent their development.

We do not agree that BLM has completely analyzed its options concerning the pre-FLPMA leases in Little Bookcliffs WSA. The leases, while unitized, are not permanent. The operators are required to perform minimal diligence in order to prevent the unit from contracting. At least one of the major oil and gas units is subject for contraction this fall, and all units except Monument Rocks are subject to contraction on or before October 13, 1986. Assuming BLM obeys its legal obligations in strictly applying the oil and gas regulations, the units should contract when the unit operators fail to meet their unit obligations. Given the present sorry state of the natural gas market, and the fact that there has 204 been no activity in the bulk of the WSA in the last two years, it is extremely unlikely that the units will not contract, assuming that BLM does not allow the unit operators to squire out of compliance with the regulations. When the units contract, many of the pre-FLPMA leases in the WSA will become subject to expiration the same as any other non-unitized lease on the public lands. Since the contraction date (1986) for the units is well in advance of the expected date of action by Congress, the existence of the pre-FLPMA leases at this point should not be an insurmountable obstacle to recommendation of Little Bookcliffs as suitable. It would be extremely unfortunate if BLM were not to recommend the

204 WSA as suitable on the basis of leases that later expired. The RMP requires some elaboration on this point.

233 The RMP should list the pre-FLPMA leases, the lessees, oil and gas units, unit operators, and unit contraction dates and requirements.

Current management of the Little Bookcliffs area dictates no further coal leasing due to unacceptable impacts on other resources, apparently referring to wild horses. The Preferred Alternative, on the other hand, states that coal leasing will be acceptable in Little Bookcliffs Wild Horse Range pending further study of the effects of surface facilities in Coal Canyon on the viability of the horse herd. BLM needs to expand that study to consider the impacts to primitive recreation and outstanding 29 natural features of coal leasing on the other portions of the Little Bookcliffs area, such as Spring Canyon, Main Canyon and Cottonwood Canyon. Primitive recreation opportunities and undisturbed natural environments are a rapidly disappearing attribute of the Bookcliffs region. Even underground coal mining could severely disrupt recreation and natural values in Little Bookcliffs through subsidence, noise from ventilation fans, and coal exploration drill holes.

The pre-FLPMA coal leases are not an insurmountable obstacle to wilderness either. BLM has the authority under federal coal regulations to initiate exchanges of federal coal leases. In a case such as this one, where significant public values, 26 i.e., wilderness, wildhorses, and recreation, have been placed in jeopardy by previous leasing from a time when multiple-use was not the guide for BLM management, it is particularly appropriate that the option of exchange for the leases in Coal Canyon be pursued. The RMP needs to devote some consideration to this option.

There will be only one opportunity to preserve a piece of the Bookcliffs in their natural wild condition. Let us not blow it by perpetuating previous errors in resource allocation. When Little Bookcliffs was originally leased, no consideration was given to wilderness or other natural values. This is the time to correct that oversight.

The Palisade -- COSC thoroughly disagrees with BLM's nonsuitable 205 recommendation for The Palisade WSA. "Configuration, steep slopes, and potential trespass problems" (RMP at 385) are BLM's reasons for its recommendations. These are transparent reasons at best.

With respect to potential trespass problems, the Manageability Alternative in the RMP points out that with the simple acquisition of three public access right-of-ways, there would be no trespass problems. Access to Fish Creek, Northwest Creek, and Bull Draw would circumvent nearly every conceivable trespass problem. It is unreasonable for BLM to claim the simple lack of three access points as justification for an unsuitable recommendation when the Preferred Alternative in the RMP is proposing 37 right-of-way acquisitions elsewhere. When the resource in question is an ecologically unique and diverse area that would be a significant addition to the National Wilderness Preservation System (RMP at 387), surely a little more effort is required by BLM at solving trivial problems such as access.

205 Since when did steep slopes disqualify wildlands from wilderness designation? The Palisade is blessed with steep slopes (that is much of the attraction of the area, looking at the precipitous cliffs and spires), but there are ample opportunities for scaling these steep slopes. The western boundary road is one place; the flanks of Northwest Creek are another; the Fish Creek area is another. Once scaled, these steep slopes offer some of the most dramatic views in the resource area.

Configuration is not the problem BLM makes it out to be. Alternative boundaries can be drawn for The Palisade which leave out the conflicts in Bull Draw Basin without as many deletions as BLM proposes. For example, there is little, if any, ORV use to the west of The Palisade itself. There are only very few, scattered trees in this area, not an attractive spot for cutting firewood. There is no need to draw the boundary on this west side all the way back to the base of The Palisade. Configuration should not pose an impediment to retaining the integrity of the wilderness in any case, since BLM has made a point in the RMP of emphasizing the steep slopes of the unit, which would effectively preclude unauthorized incursions into the area.

The fundamental issue is whether BLM believes any portion of Unaweep Canyon should be protected as wilderness. The Palisade is a particularly appealing piece of Unaweep Canyon since BLM would get a bonus of including a spectacular piece of the Dolores River Canyon as well. We agree with BLM's conclusion that failure to include The Palisade as wilderness would be a major adverse impact on the National Wilderness Preservation System (RMP at 387). The reasons put forth by BLM do not justify such a harsh sentence.

We do support the designation of The Palisade itself as an Outstanding Natural Area, but there are many other outstanding natural portions of the area, including Northwest Creek with its gurgling trout stream, and the small, pristine alcoves and amphitheatres along the cliffs to the north and west of The Palisade. Wilderness designation would encompass all of these "outstanding natural areas."

Demaree Canyon -- COSC supports Demaree Canyon WSA as suitable for wilderness, and opposes BLM's nonwilderness recommendation for the area.

BLM's finding that outstanding opportunities for primitive recreation do not exist in the area is wrong. On the several occasions when COSC sponsored trips have visited the area, participants have had thoroughly satisfying wilderness experiences. There are terrific views of the snowcapped La Sals rising out of shimmering red rock canyon country across the Grand Valley. There are abundant collections of blooming cactus at appropriate times of the year, which offer outstanding photographic opportunities. If one hikes up the canyons
222 themselves, one encounters lush knee-high grasses all along the banks of the creek beds, occasional waterfalls, and deep, serpentine gorges. Perhaps BLM has not visited the area on the ground enough to get a sense of the outstanding recreational opportunities. Given the minimal recreational use recorded in the WSA, BLM should take heed of the comments from those who have actually visited the area with respect to the outstandingness of the recreational opportunities.

Before BLM writes off Demaree Canyon due to pre-FLPMA leases, BLM should analyze the oil and gas unit agreements to determine if they are really an obstacle to wilderness designation, as we proposed for Little Bookcliffs WSA. As with Little Bookcliffs, BLM needs to list the pre-FLPMA leases, units, unit operators, and contraction dates and requirements.

There are substantial benefits to wildlife, such as wintering mule deer, due to wilderness designation of Demaree Canyon. The RMP's analysis makes no mention of wildlife as a significant resource or issue in Demaree Canyon WSA.

As with Little Bookcliffs, Demaree Canyon is BLM's only other opportunity to preserve a portion of the Bookcliffs region as wilderness after deleting 75,000 acres of other Bookcliffs roadless lands earlier in the wilderness review. This uniqueness should carry some weight in the decision process.

RIVERS

BLM has done an excellent job with the A-1 recreation management emphasis area designation for the Colorado River through Ruby and Horsethief Canyons. The mineral withdrawal is particularly necessary to ensure continued protection of the pristine nature of the canyons and to ensure continued qualification of the river for inclusion in the Wild and Scenic Rivers system. COSC supports acquisition of the Loma launch site to facilitate visitor use of the river. We also support non-fee
177 permits for both commercial and private users, providing that if limitations on the number of permits become necessary, private users will be given preference in permit applications.

BLM is proposing inadequate protection for that portion of the Dolores River from Gateway to the confluence recommended for Wild and Scenic designation in the same study which recommended the lower Colorado for designation under the Wild and Scenic Rivers Act. It seems that BLM should manage rivers that have been
177 recommended for designation by the Department of Interior in similar fashions. This lower portion of the Dolores is without a doubt a spectacular and remote desert river exemplifying the finest qualities necessary for inclusion in the National Wild and Scenic Rivers System. The RMP should propose management for the river which will perpetuate these qualities. Specifically, BLM should propose a mineral withdrawal for the river corridor to complement its proposed no surface occupancy leasing and VRM Class II decisions.

We continue to believe that BLM should conduct a Wild and Scenic River eligibility report for the Gunnison River from Escalante State Wildlife Area to Whitewater, as the Forest Service has in its resource management plans for rivers under its
176 jurisdiction. We agree with BLM's comment in the Affected Environment section of the RMP that the Gunnison River possesses attributes suitable for scenic or recreational river designation. BLM should evaluate those qualities, such as it did for roadless areas in the initial inventory of the BLM Wilderness Review, and make a recommendation for a full-scale study of the wild and scenic characteristics of the river. This was an issue raised in scoping, and mentioned repeatedly in every public comment period since scoping.

COSC supports BLM's proposed management under emphasis area A-2 for the Gunnison River corridor as far as it goes. We support the no surface occupancy leasing requirement, identification of the river corridor as unsuitable for utilities, and designation of the river corridor as a VRM Class II area. These restrictions are necessary to preserve the natural, scenic, and recreational values of the river corridor. However, we also think it extremely
70 critical that mineral materials sales and free use permits be prohibited along the river corridor as this is likely the gravest threat facing the river.

RECREATION

Overall, BLM has done a commendable job in the RMP of protecting and enhancing recreational opportunities in the resource area. Restricting fuelwood and sawtimber harvest in Bang's Canyon/Northeast Creek, Binbad Valley, Granite Creek, The Palisade, and South Shale Ridge will greatly help to reduce helter-skelter activity in these areas and the resulting widespread, progressive deterioration of primitive characteristics that accompanies intensive fuelwood gathering.

COSC supports the proposed A-2 recreation management emphasis area with its emphasis on semi-primitive recreation opportunities for Bang's, Rough, Northeast, and Ladder Canyons. These canyons provide backyard recreation for residents of the Grand Valley.

We support the proposed semi-primitive, non-motorized recreation management for Hunter and Garvey Canyons in the Bookcliffs. Does this mean that Hunter Canyon will be closed to motorized use above the last parcel of private land in the canyon mouth? If not, it should be. What is the status of Hunter Canyon
186 with respect to coal leasing? We believe there should be no leasing requiring surface facilities in Hunter Canyon. What is BLM's position on this? The proposed VRM Class II objectives for the cliffs of Hunter and Garvey Canyons are supported. BLM should make an effort to eliminate road building in upper Hunter Canyon, all the way up to the Roan Cliffs, in order to provide for an intact, semi-primitive canyon from the foot of the Bookcliffs to the Roan Cliffs. Does BLM's proposed semi-primitive, non-motorized management for Hunter Canyon extend this far?

We are pleased with the proposed semi-primitive, non-motorized recreation management for Granite Creek, with no surface occupancy leasing and VRM Class II objectives. We generally support both the K-1 and K-2 general natural resource management emphasis area prescriptions (with the exception of the wilderness recommendation for The Palisade). However, Northwest Creek should also be managed for semi-primitive, non-motorized recreation to
180 enhance its sport fishery, natural, and scenic values. In particular, Northwest Creek should be off-limits to fuelwood and sawtimber harvest.

We have some major concerns over BLM's proposed location of trailheads on the boundaries of each of the newly proposed wilderness areas. BLM has expressed concern in the past over its ability to manage wilderness in light of the increased recreational use that may accompany wilderness designation and in light of shrinking budgets. Placing new trailheads on the borders of these currently undeveloped areas will only exacerbate BLM's
234 management problems by explicitly encouraging the type of overuse BLM feels unprepared to handle. When visitors come to the Resource Area office looking for places to hike, BLM will point to its six or seven trailheads, all on the boundaries of wilderness areas. BLM should instead develop trailheads at its proposed semi-primitive recreation areas such as Hunter Canyon and Bang's Canyon. That will help to divert recreational use away from wilderness. BLM should also keep in mind that recreation is but one of the purposes of wilderness. Preservation of the natural environment of the wilderness should be the foremost management concern.

The particular trailheads we are most concerned by are those
235 in Binbad Valley and Knowles Canyon. We support acquiring legal access through Binbad Valley to Binbad Ridge, but we definitely oppose construction of a trailhead with gravel parking area,

outhouse, bulletin board, etc. that would "direct use into Sewemup
235 Mesa", as the RMP states (p.102). Sewemup Mesa is fragile enough that it does not need any extra use encouraged by BLM. Similarly, Knowles Canyon is one of the most remote parts of Black Ridge Canyons. No extra effort should be made to direct use to this area. A trailhead at Rattlesnake Canyon for the arches may be appropriate given the popularity of the area, but BLM should take a hard look at its other proposed trailheads.

LAND DISPOSAL

One of COSC's greatest areas of disagreement with the Preferred Alternative concerns lands proposed for disposal. Many of the 155 tracts identified for disposal have significant public values that should mitigate against disposal by BLM. We will list our specific concerns with proposal disposal tracts as follows.

Binbad Valley -- Tracts 427 and 429 have significant public recreational values. These tracts constitute portions of scenic Binbad Ridge, as well as portions of the greater Sewemup Mesa-Roc
244 Creek BLM and Forest Service roadless area. The tracts sit in the scenic foreground of the view west from atop the cliffs of Sewemup Mesa. Any action that might result in private development of these lands would detract from scenic vistas out of the WSA.

Unaweep Canyon -- We vehemently oppose disposal of tracts 419, 420, 421, 422, 423, and 424. Unaweep Canyon is perhaps the most scenic rural valley in western Colorado. Every effort should be made by the public land managers to assure the continued
243 preservation of the scenic attributes of the canyons. If the Forest Service is not interested in managing these tracts, then BLM should retain them. Some of these tracts likely contain critical big game winter range as well.

Whitewater Hill -- We oppose disposal of tract 201. This tract
246 forms a scenic backdrop to Grand Junction as one looks east from town toward the Grand Mesa, as well as an undeveloped foreground for the Mesa. The scenic values of this tract outweigh any need for development at this time.

Lower No Thoroughfare Canyon -- We strongly oppose disposal of tract 301, the lower end of No Thoroughfare Canyon and the approach to the east entrance of Colorado National Monument. This tract constitutes a significant public recreational asset in the form of an undeveloped tract of land acting to set the National Monument off from the encroaching residential developments of Grand Junction. Disposing of this tract will accelerate the
245 already serious visual degradation into and out of the National Monument as well as exacerbate the management difficulties of the Monument. The Monument's master plan listed residential encroachment as the major threat to the integrity of the park. Another federal agency should do nothing that increases the severity of the problem.

245 Tracts 304 and 326 -- See the above. Additionally, tract 304 potentially provides public access to the Monument through what is becoming increasingly blocked off private land.

242 Colorado River Lands -- We oppose disposal of Colorado River bottom lands, specifically tracts 415, 416, 418, 431, 432, and 433. River lands comprise important riparian areas and are frequently valuable recreational areas as well. Transfer of these tracts out of public ownership would contradict the planning criteria 11 and 12 under Category 1. These lands are also likely in flood plain areas, criterion I.14.

277 Tracts 115 and 116 -- These tracts contain riparian areas and potential public water reserves. Disposal would be contrary to planning criteria I.11.

278 Tract 150 -- Tract 150 does not appear to be an isolated tract in the least. It is contiguous to an extensive block of public land. Tract 150 also contains several springs and may be a potentially valuable recreation area. The tract likely contains valuable public mineral resources as well. Disposal would be contrary to numerous planning criteria. Is there an interest in this particular tract by an oil shale company?

248 Tracts Adjacent to Grand Mesa NF -- Tracts 24, 31, 18, and 17 are all adjacent to National Forest land. They should not be considered to be isolated tracts of public land when extensively bordered by National Forest. These tracts contain valuable recreation resources and should not be transfered out of public ownership if the Forest Service does not wish to manage them.

279 Acquisition -- We strongly support BLM's proposed acquisitions in Little Bookcliffs Wildhorse Range and Dominguez Canyons WSA. In addition, we would like to urge acquisition of other valuable parcels as they become available, including Unaweep Seep, Plume Canyon, and Devils Canyon.

OIL AND GAS LEASING

The Preferred Alternative increases the total acreage open to leasing as compared to current management by a good 20% (Table 2-5), or by more than 200,000 acres. BLM could recommend both Little Bookcliffs and Demaree Canyon WSAs as suitable for wilderness and still increase available lease acreage by a substantial amount.

Little Bookcliffs Wild Horse Range is closed to leasing under current management (RMP at 71). How does BLM explain the existence of recent oil and gas leases in the area, such as those at the confluence of Main and Cottonwood Canyons and in the vicinity of Round Mountain, if current management is no leasing? Did BLM ignore its previous land use decisions and allow leasing in these instances?

Archeological sites are most impacted by improved access to sites. BLM's proposed mitigation (no surface occupancy leasing) for cultural sites does not address the real issue, i.e., increased access. BLM has commissioned a number of studies, such as "A survey of vandalism to archaeological resources in Southwestern Colorado" by P. Hickens, et al., BLM Cultural Resource Series No. 11, which directly correlate increased vandalism with increased access. No leasing of valuable cultural sites is the most appropriate form of mitigation.

165

ACCESS (TRANSPORTATION)

We are in complete agreement with BLM's proposed easement acquisitions. Lack out of the public from public lands has been, and will continue to be, a significant issue in this resource area. Specific easement acquisitions with which we are familiar and which we believe to be of the utmost importance include: Barrel Springs, Little Dominguez, Plume Canyon, Devils Canyon, Carr Creek, Middle North Dry Fork, Prairie Canyon, South Canyon, Bunger Road, Hunter Canyon, Douglas Pass East, and Sinbad Valley.

UTILITIES

COSC strongly supports BLM's designation of utility corridors in the Preferred Alternative. We also strongly support the utilities restrictions for Unaweep Canyon, i.e., only telephone lines and small power lines; the prohibition of utilities along river corridors for the most part; and the prohibition of utilities in Hunter Canyon.

VISUAL RESOURCES

190 COSC supports the proposed VRM Class I and Class II designations of the Preferred Alternative. All public land in Unaweep Canyon should be managed under VRM Class II objectives, not just the cliffs.

SPECIAL MANAGEMENT AREAS

COSC supports the proposed special management areas of the Preferred Alternative. Research Natural Areas are preferred to ACECs due to their better defined management goals. The proposed RNAs will offer protection to a number of outstanding features of substantial scientific value.

LIVESTOCK GRAZING

COSC strongly endorses the Preferred Alternative's proposal to give special attention to the visual and ecological integrity of riparian areas in the implementation of livestock grazing management plans. There is nothing more aggravating to the public users of public lands than to run across riparian areas devastated by inappropriate livestock use.

THREATENED, ENDANGERED, AND SENSITIVE SPECIES

We are favorably impressed by BLM's identification of threatened, endangered, and sensitive species in the Grand Junction Resource Area (RMP at 129). This list is undoubtedly the most complete of any RMP in Colorado. We trust it will be of use to BLM managers in implementing the RMP.

COMMENTS ON APPENDIX E, OIL AND GAS, RELATIVE TO PREVIOUS ENVIRONMENTAL ASSESSMENTS OF OIL AND GAS DEVELOPMENT IN LITTLE BOOKCLIFFS WSA

Sections 3 and 4 of Appendix E are apparently in response to IBLA's decision in IBLA Case 84-184, dated May 31, 1984. The following comments concern BLM's reanalysis of oil and gas development in Little Bookcliffs WSA/WHR, as required by IBLA.

IBLA remanded the case to BLM in order to answer a fundamental question, in the words of IBLA

"so that BLM may prepare a new EA and determine, in light of additional data and analysis, whether an EIS is called for."

32 Where in the analysis is BLM's determination as to the necessity of an EIS? It is not in Appendix E. It was not obvious anywhere else in the draft RMP/EIS. By incorporating the analysis into the RMP/EIS and its appendices, is BLM determining by default that approval of 10 APD's in Little Bookcliffs WSA/WHR is a significant federal action requiring an EIS? The way in which the analysis is scattered throughout the RMP/EIS, it is difficult to piece together all components of the analysis. The site-specific impacts are detailed in Appendix E while the summary of cumulative impacts is discussed in Chapter 4 of Appendix I, the Wilderness Suitability Analysis. It would facilitate review of the analysis if everything were consolidated.

BLM's evaluation of individual lease conditions appears to satisfy one of our original concerns.

The site-specific analysis of alternative locations for each well appears satisfactory, assuming, as BLM does, that it has no authority to force a change in location by the lessee.

33 APD's are current for one year only. Have all ten APD's in Little Bookcliffs WSA/WHR been renewed within the last 12 months?

34 Has BLM determined that helicopter access is infeasible since no mention of it is made in the analysis? Helicopter access to drill sites is not unheard of in this area, as evidenced by drill holes located by helicopter in the Garvey Canyon area as part of coal exploration.

35 COSC disagrees with BLM's statement (RMP at 278) that "extremely high resource values" are not at stake here and that suspension of leases is inappropriate. As we have indicated on many occasions, the last roadless areas in the Bookcliffs possess value beyond measure. They will never, repeat, never be replicated anywhere on earth. They are truly priceless. We equate priceleseness with extremely high resource values.

236 BLM's conclusion (RMP at 367) of cumulative impacts due to development of pre-FLPMA leases in Little Bookcliffs WSA/WHR is apparently that the wilderness values of the WSA will be irretrievably lost and that this constitutes a major adverse impact. BLM continues its cumulative impact analysis by estimating that there could be 31 new wells, 31 miles of new roads, and 18 miles of new pipelines constructed within the WSA over the next 20 years. How does BLM arrive at this estimate? Where does BLM estimate that these impacts will occur? Will roads be constructed throughout the lengths of Main Canyon, Cottonwood Canyon, and Spring Canyon?

236 Similarly, BLM's analysis of cumulative impacts to Demaree Canyon WSA estimates 33 wells, 33 miles of new roads, and 19 miles of new pipelines over the next 20 years. How does BLM arrive at this estimate and what are its particulars?

204 The fundamental flaw underlying all of BLM's analysis is its omission of any discussion of unit agreements. The fact that oil and gas units are subject to contraction five years after their creation should be one of the major topics of the analysis, particularly since every unit in the Little Bookcliffs WSA/WHR with the exception of Monument Rocks is scheduled for contraction on or before October, 1986. BLM's analysis should list the units and their contraction dates, the requirements for diligence by unit operators, and the likelihood these operators will meet their diligence requirements by October of 1986 given predicted trends of the gas market. BLM should use the same assumptions concerning future gas pricing for this analysis as it used in Appendix E when it discussed the additional costs associated with directional drilling from alternate well site locations. Does BLM expect operators to live up to the requirements of the units given the most realistic gas prices of $3-$5/MCF?

204 It is our understanding that once units contract, operators have two years in which to drill on leases now outside of the unit. If the operator fails to initiate drilling, the leases expire at the end of two years. Given this scenario, many of the pre-FLPMA leases within Little Bookcliffs WSA would likely expire long before Congressional action on BLM's final wilderness recommendations, and quite possibly before any upswing in the gas market.

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COGC RMP Comments
July 9,1985
Page 16

Does BLM intend to enforce its oil and gas regulations to the letter in controversial instances such as contraction of unit aggreements in WSAs? There should be no exceptions granted in WSAs.

36 How does BLM intend to respond to future APDs? Will an extensive EA be written containing discussion of alternate well site locations and alternate means of access such as helicopter? It would seem this is the least required by IBLA's request for site-specific analysis of APDs.

32 How does BLM intend to respond to IBLA in conclusion to IBLA Case 84-184? Will the entire RMP/EIS be forwarded to IBLA for their inspection?

We have appreciated the opportunity to comment on the draft RMP/EIS, both at this point and throughout its development. We will be following implementation of the proposed plan with great interest.

Sincerely,

Mark Pearson

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POWDERHORN COAL COMPANY

July 12, 1985

Mr. Forest Littrell, Area Manager
Bureau of Land Management
Grand Junction Resource Area
764 Horizon Drive
Grand Junction, Colorado 81506

Subject: Draft Grand Junction Resource Area Management Plan and Environmental Impact Statement

Dear Mr. Littrell:

Referencing the methodology used in identifying areas acceptable for futher coal leasing consideration, found in Appendix D of the subject plan, Powderhorn Coal Company disagrees with the BLM's "analysis" of Criterion 17 found on page 256.

Criterion 17 on page 256 states,

"Federal lands which may have been committed by the surface management agency to use as municipal watersheds shall be considered unsuitable.

EXCEPTION A lease may be issued where the surface management agency in consultation with the municipality (incorporated entity) or the responsible governmental unit determines, as a result of studies, that all or certain stipulated methods of coal mining will not adversely affect the watershed to any significant degree.

ANALYSIS The Palisade municipal watershed is within the potential coal lease area and encompasses the Rapid Creek watershed. Presently the lower part of the watershed is leased for coal. The upper part, containing Palisade's reservoirs and collection systems, has not been leased. Much of Palisade's water supply is derived from springs filtering through fractures in the basalts on the Grand Mesa. Underground coal mining through subsidence or

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direct interception might cause these waters to reroute away from their present locations. This could cause a serious impact on Palisade's water supply. The coal beds are well below ground in the area, but the fracture system supplying these springs is not well understood. These fractures are probably deep-lying, and even subsidence that didn't reach the surface could impact them. Thus, all of the area that feeds Palisade's water system is unsuitable for leasing, pending further study of the area's hydrologic system. This would take approximately 10,000 acres of land out of the potential coal lease area, most of which is private surface, federal minerals.

The town of Palisade supports no coal leasing in the area where they obtain their water supplies. They have no objections to coal leasing in the lower part of their watershed as long as the coal company is responsible for any damage to their pipelines."

We agree that the upper water shed and springs must be protected, in lieu of a hydrologic study. However, the area down gradient from the springs and intake structures should not be subject to the coal leasing exclusion for the same reasons that the Town of Palisade has no objections to coal mining in the lower part of the watershed as long as the coal company is responsible for damage to their existing pipelines.

We believe that the existing watershed area deemed unsuitable in the "analysis" by the BLM is too large and that the following area should be considered for additional coal leasing in the lower watershed area.

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T11S, R97W, 6th P.M.

Section 3	All
Section 4	All
Section 5	All
Section 8	N½
Section 9	All
Section 10	All
Section 16	All with exception to a buffer zone around the Rapid Creek Intake in the SW¼ of the SW¼

T11s, R98W, 6th P.M.

Section 24	All

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A map is enclosed for your convenience which shows the area that should be considered in the management plan for additional coal leasing.

If you have any questions please notify us.

We appreciate the opportunity to comment on the management plan.

Sincerely,

Dale L. Hamilton, P.E.
Assistant General Manager

DLP:HAB:tgn

cc: Jim Stover

Enclosure

61

THIS LETTER HAS BEEN REPRODUCED

To the Attention of Forest Littrell

293 As a Land Lease holder and as a state resident I am writing in regards to your proposed road 24, 25, 26, identified on Preferred Alternative Map 5. I see this proposal as a grave mistake. Opening the Roads to more constant public use degrades the roads leaveing turrets and making it difficult for the Leaseholders and Landholders to use. And there would be noway for the BLM to properly maintain this road without prohibitive cost to the taxpayer. Even if the road was attempted to be maintained due to the steepness of the terrain it would be a matter of hours in bad weather until the road would be virtually impassable, therefore trapping much of the public. The additional costs to we the Leaseholders and Landowners such as gates cattleguards signs ect. and the unforeseeable are far more numerous than you have time to read or I have time to write. So how could either one of use expect to pay for these additional costs. In regards to additional, the Wildlife Division has far more territory than they can possibility patrol now, therefore it would create a poacher's haven, not to mention the added risk to us livestock owners. At present this would not only ruin my livelihood of 15 years as an Outfitter and Rancher it would be a grave threat to the Wildlife in this area. You must be reminded that your hunter acess, Spear acess road kill 40% of the mule Deer natural migration route to Deer park and wintering grounds. This proposal would virtually destroy the rest of it. At present there is a controlled hunt with a limited few and small amount of hunters. Therefore not only, not interferening with there migration but providing a small refuge which now days are few and are found mainly on private ground. Due to our very poor Wildlife Management which has unlimited License sales an is so commercialized in making the almighty dollar$. The place would be overun with Hunters, killing not only the game but the only source of revenue to the BLM who is the Outfitter fore the public hunter but not the public hunter, therefore only creating an added expense to maintain more roads. Which would appear as a unforbeable business decision in the eyes of almost any concerned taxpayer. It would take a fool just short of the Highway project in Glenwood canyon just to allow Hunters and the public to safely pass when meeting on the narrow roads. Last but not least it would KILL any benfits of the proposed wilderness area by giving it public access from all sides. I don't believe any average taxpayer would consent in the selling off such natural beauty either. So why bill out to a bunch of seasonal hunters too lazy to walk or ride a horse. If anything confirm the Existing Roads and annex them to the porposed Wilderness Area. This area is virtually free of trash. What will it look like after the public has been ther 10 years. This Letter may seem frank but if your honest with yourself I'm sure you'll find the letter is also honest. Thank you

Sincerely /s/ David Furr

62

STATE OF COLORADO

DEPARTMENT OF NATURAL RESOURCES

DAVID H. GETCHES, Executive Director

1313 Sherman St., Room 718, Denver, Colorado 80203 866-3311

July 3, 1995

RECEIVED

JUL 10 1995

Mr. Kannon Richards, State Director
U.S. Bureau of Land Management
1037 Twentieth Street
Denver, CO 80205

Dear Kannon:

I am pleased to comment on the Draft Grand Junction Resource Management Plan (RMP). This letter and its attachments constitute the official comments of the State of Colorado.

The Draft RMP is well prepared and provides an excellent description of the Resource Area and each of the management alternatives. We support the Preferred Alternative as a well balanced approach, with a few exceptions. We are particularly pleased that the preferred alternative has responded to many of our previous concerns raised during the planning process.

Our specific comments on the Draft RMP are as follows.

Recreation

The RMP provides a good presentation of future recreation management. We are pleased to see the proposals for OHV management. The Grand Junction Resource Area has historically received extensive OHV use. Restricting cross country vehicle traffic coupled with seasonal closures should greatly improve the current situation.

Wildlife

The State supports BLM's preferred alternative and access acquisition plan which will make it easier to manage these public lands. We appreciate the emphasis given to the wildlife resources and the commitment to increase deer and elk populations to meet Division goals. The protection of important fish and wildlife habitats and the development of additional habitats on these public lands will help to reach these goals.

Although we agree with the preferred alternative, several issues are of concern. First is the disposal of nearly 20,000 acres of public land, much of which contains important wildlife habitat. We have identified

62

Kannon Richards
July 3, 1995
Page Two

individual tracts which should be retained in public ownership in the attachment and would like to be included in discussions of all tracts scheduled for disposal.

237 A second concern is our ability to manage the bighorn sheep herds in the Black Ridge Canyons and Dominguez Canyon Wilderness Study Areas. There may be an infrequent need to use the existing roads for trapping and transplanting to preserve the two herds. We hope that this would be allowed as an administrative use.

Further specific comments of the Division of Wildlife are provided in the attachment.

Soils

9 The preferred alternative can be improved from a soil and water standpoint by treating the additional 500 acres of "critically eroding soils" in Cactus Park. If funds are not available to treat the entire 1,500 acres, it would be beneficial to treat not just the most critically eroding areas, but areas that will act as buffers or sediment collection zones. This will, in turn, provide the most benefit for water quality as well.

Wilderness

We support the RMP's recommendation of the Black Ridge Canyons, Black Ridge Canyons West and Dominguez Canyon for wilderness and the designation of the Palisade as an Outstanding Natural Area. These wilderness study areas provide superb opportunities for solitude, unconfined recreation and scenic viewing and are well deserving of wilderness status.

161 We are concerned about potential oil and gas activities in the Little Book Cliffs if the area is not recommended for wilderness. The RMP states that development of pre-FLPMA leases would reduce critical wintering and foaling area by 10%. The document should discuss in greater detail the cumulative impacts to the herd of any additional future leasing.

Special Management Areas

111 We support the proposed Research Natural Area designations in the preferred alternative for: Unaweep Seep (37 acres); Pyramid Rock (470 acres); Gunnison Gravels (5 acres); Rough Canyon (1470 acres); Fruita Paleontological Locality (280 acres); Rabbit Valley Paleontological Locality (280 acres) and the Outstanding Natural Area designation for the Palisade (1920 acres). In addition, we recommend that Badger Wash receive a Special Management Area designation to protect the botanical values associated with the site. Badger Wash contains two plant species

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Kannon Richards
July 3, 1995
Page Three

111 (Cryptantha elata and Eriogonum contortum) and one plant association (Atriplex gardneri/Elymus salina) of special concern to Colorado. The draft RMP is not clear on how the withdrawal of Badger Wash as a hydrologic study area will assist in the protection of the plant species and plant associations of special concern to Colorado.

256 The State recommends an ACEC designation to the preferred alternative of the RMP for protecting riparian values on 160 acres of Skipper's Island. Skipper's Island apparently has one of the largest concentrations of riparian habitat on public lands in the Grand Junction Resource Area.

149 Species listed in Table 3-9 should have scientific names followed by accepted common names. Please note that all of the plant species listed in Table 3-9 occur on the Colorado Natural Areas Inventory's list of plant species of special concern to Colorado. Several plant species listed in Table 3-9, in addition to several other plant species on the Colorado Natural Areas Inventory's list, require further studies prior to decisions on their ecological status and habitat requirements. The Colorado Natural Areas Program will continue to work with the Grand Junction Resource Area to complete inventories on high priority plant species which occur in the Resource Area. "Sunloving meadowrue" is misspelled in Table 3-9.

Water Resources

15 There may be a significant number of well applications for water supply on the 20,000 acres of land to be turned over to the private sector. While most of the Grand Junction Resource Area is not yet over-appropriated, there is no guarantee that these permits for wells will be available. The water supply problem is greatest in the northeast section of the Resource Area where all streams flowing into the Colorado River from the north and above Plateau Creek are considered over-appropriated and new water rights are subject to river administration. We question the assumption, made on page 145, that "water rights necessary for the construction of projects can be acquired". Purchasers and developers should be made aware that they may not be able to obtain an adequate water supply for their needs.

Please advise the Colorado Water Conservation Board of activity plans prepared for each identified salinity control projects mentioned in Table 2-2 of the report. The Board has provided a listing of the State of Colorado's instream flow rights in Delta, Garfield, Mesa and Montrose counties and would also like to be informed when BLM management activities may affect State instream flows.

16 What 100-year floodplains has BLM identified in the Resource Area? Attached for BLM use is a floodplain index map showing identified 100-year floodplains in the four counties covered by the Grand Junction Resource Management Area.

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Gannon Richards
July 3, 1985
Page Four

Air Quality

1 The plan does not recognize air quality or the protection of air quality related values as an integral element of resource management. Further, the
2 plan needs to look at cumulative issues that may affect urbanized areas such as Grand Junction. This would include oil, gas, and coal leases that may generate secondary growth in the urbanized areas.

In chapter 3, the "Affected Environment", a number of comments are appropriate:

3 1) Not all Colorado lands are classified as Category I. Only certain national parks, national monuments, and wilderness areas are designated Category I.

4 2) The Department of the Interior (and the State) has recommended the Colorado National Monument for Class I protection but this is not a final action as yet.

5 3) Some of the statements in chapter 3 are misleading. If not untrue. For example, our analysis of the Category I increment at the Colorado National Monument indicate that for that monument a great deal of industrial growth could be accommodated under the Category I increment.

Cultural Resources

The State Historic Preservation Officer has reviewed the RMP and found the consideration of cultural resources in the preferred alternative to be adequate. The use of the RFD documents in the planning process is commended. These documents should enhance the accurate identification of cultural resources important to the region.

BLM should consider entering into a Programmatic Memorandum of Agreement with the State Historic Preservation Officer and the Advisory Council on Historic Preservation concerning the 106 compliance procedures to be followed.

Again, we appreciate the opportunity to comment and are available to consult with you further throughout the planning process.

Sincerely,

DAVID H. GUTCHES
Executive Director

DHG:tl
6721

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SPECIFIC COMMENTS

Grand Junction Draft RMP

280 Page 27, 2.Category II, Disposal Tracts

Please explain the statement "Generally, the BLM will not acquire private land through exchange in the vicinity of disposal tracts." The best way to minimize an adverse impact to wildlife is to exchange for similar habitat in that vicinity.

95 Page 42, Support, Paragraph 1, Sentence 4

The statement that harvest levels have a direct impact on habitat condition is not necessarily true. Animals will concentrate in some areas irrespective of population density.

157 Page 44, Livestock Management, Implementation, Paragraph 1, Sentence 2

Add wildlife to the list of proposed actions in the RMP.

237 Page 53, Left Column, Paragraph 5, Sentence 2

The statement is made that grazing permittees will still be able to use several existing roads in the Black Ridge Canyons and Unaweep Canyon WSA's for administrative purposes. The Division may also need to use these roads to properly manage bighorn sheep.

256 Page 55, Effects, Paragraph 1, and Table 2-17

Disposal of Skippers Island appears to be inconsistent with criteria numbers 11, 13, and 14 under retention areas on page 19. Instead we recommend that Skippers Island be proposed for ACEC designation (Table 2-17).

242 Page 56, Implementation, Paragraph 3, Sentence 1

U.S. Bureau of Reclamation has indicated an interest in attaining riverbottom lands along the Colorado River west of Grand Junction as part of the mitigation plan for the Gravel Valley Salinity Project.

295 Page 58, Table 2-19

Why is wildlife not listed as a benefiting resource under the Preferred Alternatives? Examples: 6-A Mountain, Horse Mountain.

96 Page 72, Left Column

The emphasis on water for the current management alternative should benefit wildlife. Why isn't a statement on wildlife included here?

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183 Page 96, Area A-2, Recreation, Sentence 2

BLM approves a one mile shooting closure on BLM land on either side of the Little Park Road. This area is used for hunting and target shooting. Why shouldn't the public be allowed to shoot here? Who would enforce this regulation?

196 Page 106, Left Column, Off-Road Vehicles

OHV use should be controlled on the 27,956 acres of land identified for disposal until final disposition is reached. Skipper's Island and other tracts provide important wildlife habitat which will require continued protection during this process.

A paragraph on wildlife should be included under Area G4.

97 Page 123, Vegetation

It would be helpful to list the unusual plants in the resource area in addition to Table 3-5.

98 Page 124, Wildlife, Last Paragraph

Deer and elk numbers are different from those given on page 41 (upper right). Why?

91 Page 127, Right Column, Paragraph 3, Sentence 3

How is livestock grazing having a diminishing effect on wildlife habitat?

296 Page 141, Transportation Roads

Public trespass of private land is a problem in the Resource Area. We feel that signing public land boundaries along roads would reduce the problem.

37 Page 205, Impacts on Oil and Gas, Impacts from Oil & Gas Management, Paragraph 2

Any of the 624,701 acres that lie in deer and elk critical winter ranges should be leased with the December 1 to May 1 timing stipulation to avoid disturbing deer and elk.

99 Page 207, Impacts on Wildlife, Impacts from Wildlife Management, Paragraph 3, Sentence 2

Leaving 30 percent of the sagebrush that may exist in a treatment site would be insufficient for maintaining sage grouse populations if present. In areas known to contain sage grouse we recommend treating sagebrush, according to "Guidelines for Maintenance of Sage Grouse Habitats" by Clait Braun, Tim Britt, and Richard Wallestad. We have

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99 copies of this report or it can be found in the Wildlife Society Bulletin, Vol. 5, No. 3, Fall, 1977.

237 Page 207, Impacts on Wildlife, Impacts from Wildlife Management, Paragraph 4, Last Sentence

Wilderness designation should provide security for bighorn sheep but we hope it won't preclude proper management of these two herds.

100 Page 207, Impacts on Wildlife, Impacts from Wildlife Management, Paragraph 5

We support the proposal to protect riparian vegetation along all perennial streams. However, what will be the management for riparian areas along intermittent streams? We feel these areas should receive protective management also.

101 Page 208, Left Column, Paragraph 2, Sentence 2

How many miles of stream habitat improvement would be done annually? It would be helpful to list the 22 streams and identify how many miles of each stream would be improved.

Page 208, Right Column, Paragraph 2

The last word should be "goals" not goad.

273 Page 209, Impacts from Land Tenure Adjustments

Disposal of 2,000 acres of critical deer and elk winter range appears inconsistent with criteria number 17 under Retention Areas on page 20. All tracts providing important wildlife habitat should remain in public ownership.

102 Page 209, Cumulative Impacts on Wildlife Resources, Last Sentence

We feel the control of livestock grazing in riparian habitats is just as important as no surface disturbance.

Page 211, Cumulative Impacts on Threatened and Endangered Species, Sentence 2

There would be four WSA's designated as wilderness under this alternative.

242 Page 213, Impacts from Land Tenure Adjustments

Disposal of parcels along the Colorado River could reduce public recreation opportunities on those reaches of the river. In many reaches small parcels of BLM land are the only places where the public can get off the river and not be trespassing on private property. Opportunities to hunt, photograph, and view wildlife would be lost at all

242 disposed parcels that are accessible to the public.

Page 227, Wildlife

103 The prediction that native wildlife habitat would decrease in area and quality in the long-term is a gloomy forecast. We feel relocation of surface disturbing activities can replace habitat and mitigate long-term impacts. We also feel better grazing management, habitat manipulation projects, and riparian zone management will improve habitat quality in the long-term. Does BLM feel emphasis on improving habitat quality will diminish overtime?

Map 5, Proformed Alternative Land Disposal Tracts (DR)

273 We realize not considerable work remains before a decision is made on the disposition of the 155 tracts identified for disposal. Therefore, we have selected 17-0 ones which we believe should be retained in public ownership according to criteria listed on pages 19 and 20. We have grouped these tracts under a common value although some may have a special significance not identified here.

1. Tracts providing critical big game winter range. Their disposal is inconsistent with criteria 17 on page 20.

   DR units 40, 41, 42, 43, 44, 45, 46, 102, 103, 104, 107, 109, 110, 111, 114, 115, 116, 124, 125, 126, 127, 130, 131, 132, 134, 146, 147, 148, 149, 150, and 201.

242 2. Tracts providing important riparian habitat and public use along a proposed Wild and Scenic River. Also possible mitigation areas for the Grand Valley Salinity Project. Their disposal is inconsistant with criteria 9, 10, 11, 12, 13, and 14 on page 19.

   DR units 180, 181, 419, 416, 431, 432, and 433.

281 3. Tracts providing public access and hunting opportunities in or near where access to public land is a problem.

   DR units 331, 332, 332, and 334.

282 4. Larger tracts accessible to the public and sometimes adjacent to National Forests. Disposal is inconsistent with criteria 15 on page 20.

   DR units 17, 19, 20, 31, 150, 200, 254, and 400.

OTIS C. COLES, JR.
P.O. BOX 1098
GRAND JUNCTION, COLORADO 81502
PHONE 242-7707

The Federal Express — May 17th, 1985

United States Department of Interior
Bureau of Land Management
764 Horizon Drive
Grand Junction
Colorado 81501

Attention: Mr. Forest Littrell

Re: Access Acquisition Proposals
Roads 24, 25, and 26

Gentlemen:

It has come to our attention that the Bureau of Land Management has advertised a proposal to acquire access roads Nos. 24, 25, and 26 crossing the Cow Ridge area, North Dry Park (Dittman Canyon) and Middle Dry Park which according to the BLM North 4 Map 5 would circle and cross Horse Mountain. While there is no number on the Dry Park Road according to the BLM Alternative Legend 18 Access Acquisition Proposals, a road would be proposed at this location. In referring to your BLM North 4 Map 5 I find that in each instance (with the exception of Cow Ridge Road 24, the proposed access roads will run the entire length of property tracts owned by me and it is obvious according to the Map that our existing private roads would be utilized. Please note the following Legal Descriptions comprising the total 2330.03 Acres owned by me in this area which will verify the above facts:

293

Township 6 South, Range 100 West of the Sixth Principal Meridian
Section 4: [illegible]
Section 9: [illegible]
Section 16: [illegible]
Section 20: [illegible]

Township 7 South, Range 100 West of the Sixth Principal Meridian
Section 28: [illegible]
Section 33: Lot 4,
Section 34: [illegible], Lots 1 and 2
Section 35: [illegible]

The BLM records reflect the fact that for more than twenty five years these two acreage tracts comprising the 2330.03 acres have been supplemented by BLM acreage to comprise a total acreage sufficient to support a ranching operation which in turn paid the BLM Permit Fees for this privilege.

The private road crossing my property up Middle Dry Park cost in excess of $300,000.00 and I believe it would only be right and just for me to be reimbursed for this if the proposed Access Acquisition Proposals were adopted. The existing private roads have been very difficult to maintain and in many areas are practically impossible because of the steep grades. In rain or snow conditions they become impassable. This is true despite the fact that the traffic is very light and if these roads become open to the public they will definitely become impassable. Oncoming people in the area where they would without question and without authority use my ranch house facilities, breaking in if necessary and in many cases taking what they please including bedding, kitchen utensils and even furniture; this did occur while rig wells were being drilled in the area.

It would be impossible to use the property including the BLM land for ranching or other agricultural purposes if the area and roads were open to the general public as they would cut fences or gates for access to my private property or the BLM land. Thus the BLM would lose any revenue from such use, costing the taxpayer not only the loss of this revenue, but the continuous cost of maintenance of the roads. The BLM records will reflect the fact that in the past few years a number of stock ponds or dirt tanks have been constructed primarily on the BLM land where-under the greatest portion of the cost of construction including the application of Bentonite to the ponds to reduce the leakage of water, was borne by me. These ponds were not only beneficial to livestock but to the wildlife in the area. Other ponds of a similar nature were planned but if the general public is permitted access across my property tracts I would have to abandon such plans and discontinue the upkeep of springs in the area. It is regretful but the general public allowed to circulate uncontrolled across my property and the BLM land would scatter trash the entire length of the roads and soon destroy a beautiful wilderness area. The hunting in the area is to some extent controlled at the present time because the general public is reluctant to cross the private land and this limited control protects our wildlife from complete slaughter and extinction. Most certainly the annual game kill at the present time is within reasonable limits which would without question be reversed if the general public were permitted to flood this very beautiful wilderness area. It appears to me that this particular area is being singled out for unlimited access which would soon destroy what wildlife remains.

293

In summation, it is obvious to me that any additional income from the flood of additional hunters would in no way make up for the loss of revenue from the agricultural uses, including the improvement of the property for agricultural uses by the building of additional stock ponds or dirt tanks which also serve our wildlife. The cost of maintenance of the roads would far exceed the revenue from the additional hunters. It cannot be denied that the danger of grass, brush, and forest fires would be far greater with the great influx of people.

For the reasons stated above, I am totally opposed to the Access Acquisition Proposals.

Respectfully,

Otis C. Coles, Jr.

OCC/b

BEARTOOTH OIL & GAS COMPANY
P.O. Box 2564
Billings, Montana 59103
(406) 259-2451

P.O. Box 1491
Fruita, Colorado 81521
(303) 858-3257

July 12, 1985

Bureau of Land Management
Grand Junction Resource Area
764 Horizon Drive
Grand Junction, Colorado 81506

RE: Comment of GJRA Resource Management Plan and EIS Draft March 1985

Dear Sir:

Beartooth Oil & Gas Company would like to make the following comments on the Grand Junction Resource Area Resource Management Plan and Environmental Impact Statement Draft (RMP/EIS).

General:

Beartooth recommends the selection of the Preferred Alternative as the future management approach for the Federal Lands within the GJRA.

The recommendation to drop the Demaree Canyon and the Little Book Cliff Wilderness Study Areas is a sound one. Both of these areas contain valuable gas and coal deposits which should be available to meet future energy needs. The mineral values far out weigh any "wilderness values".

We support your proposal to acquire public access, particularly in the Douglas Pass, Barrell Springs and Spink Canyon Areas.

Oil & Gas Leasing:

Beartooth Oil and Gas Company supports the leasing situations proposed in the Preferred Alternative, however we have some serious questions about a few points:

38 1. No surface Occupancy Stipulation: These areas should be kept small and narrow enough to allow for reasonable drainage and/or directional drilling (no wider than 1/4 - 1/2 mile.)

   Lease configuration should allow for reasonable well site location.

39 2. Scenic and Natural Values Stipulation: This should be used only where warrented. The requirements of this stip may make extraction of oil and gas economically unfeasible.

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40 1. Steep Slope Stipulation: This stipulation should be thrown out. It is entirely too restrictive. The stipulation's intent can be reached on a well by well site specific basis. We suggest that you realize that the Bookcliffs are under oil, gas and coal leases and that the mineral values is going to be utilized. Don't try to withdraw the area with over zealous restrictions.

8. Stipulations 4, 5, 6, 7, 8, 9, 10, 11: No problem if used in areas that really need protection.

41 5. Deer and Elk Winter Range Stipulation: Many of the areas identified are too large. There will be many requests for this stip to be waived on a case by case basis.

6. Threatened and Endangered Plant and Animal Habitat: Be careful and don't create another "Archaeological" type monster.

Oil & Gas - Standard Design Practices (SDP):

Beartooth Oil and Gas Company supports the proposed standard design practices with the following exceptions:

42 SDP # 8A - Tree slip: The requirement to remove all wood over 4" in diameter is not consistent with the BLM resource area policies. This should read may be removed or stacked outside the disturbed area.

SDP # 10 - Remember the Bookcliff were designed to wash away.

297 SDP # 13 & 14 - The GJRA should have a transportation plan that allow for orderly development of a road system. The Moab Distri Grand Resource Area has such a plan - look at it!

43 SDP #15 - Culverts are a problem in any road but to place Interstate Highway design standards on roads in the oilfield is a bit too much. the A.A.S.H.T.O.T. 99 method C or D is a waste of time and money. It is the oil and gas operators responsibility to construct and maintain our access roads.

Beartooth Oil and Gas Company would like to thank you for the opportunity to comment on this RMP/EIS Draft. It is our hope that the comments will be utilized.

Sincerely,

Ken Currey
Field Superintendent

65

1695 P Road
Palisade, CO 81526
July 14, 1985

Mr Frosty Littrell, Area Manager
Bureau of Land Management
764 Horizon Drive
Grand Junction, CO 81526

Re: Comments on Grand Junction Resource Management Plan

Dear Mr Littrell:

As Chairman of the Western Slope Group of the Colorado Mountain Club I would like to comment on the proposed Grand Junction Resource Management Plan. As you may know, the Colorado Mountain Club is a statewide organization whose primary interests are exploration and preservation of Colorado's wild & scenic resources. We presently have about 8000 members across the state, of which 50 are in the Grand Junction area.

I would like to commend you on a well organized and researched management plan. We are pleased to see that 4 of the 7 WSA,s were recommended wholly or partly for wilderness designation. However, there are additional areas that I feel should be included , as follows:

205 1. The 20,000 acres deleted from Dominquez Canyons should be reinstated, since they have the same quality of terrain as the other land in the WSA
2. With a sincere effort toward management, The Palisade could qualify for wilderness.
3. The Little Bookcliffs and Demaree Canyon should be reinstated.

We would like to encourage Wild and Scenic status for the Dolores River, and would like to see a more balanced approach to resource management in the Bookcliffs, rather than turning it over entirely to mineral leasing.

Your consideration of these comments will be appreciated.

Sincerely,
Bill Hamann
Bill Hamann

66

P. O. Box 1237
Paonia, CO 81428
July 15, 1985

The Bureau of Land Management
764 Horizon Drive
Grand Junction, CO 81506

Dear Sirs:

I wish to comment on the proposed designations for the Dominquez area.

The area is quite well known to me. I am Bill Rambo's sister and lived on the farm there for 23 years, coming back to it often.

We had a small herd of cattle and rode the two canyons, side canyons and mesas.

My parents and I worked as a team. I did light chores when very small and as I grew I did every kind of farm work: milking cows, cultivating, haying, picking and packing peaches, handling a team and wagon. I spelled words, recited multiplication tables, etc. as we worked. I didn't go to school until I was 12.

When I finished high school with a 4-year scholarship, I was unable to use it for want of a few dollars for train fare and a chence to look for work for board and room. I continued work on the farm and taught my brother, 15 years younger, for 3 years.

He was considered frail so my parents were already saving when he was four years old, to put him through college.

Bill was unable to do hard work, they felt. When the time came they managed to pay all of his expenses at college.

When I was 23, a neighbor lady left me her savings. By working for board and room, this little sum enabled me to earn 30 quarter-hours at Mesa College. Then I married.

Bill was classified 4-F when he was of military age. It was determined that war would be too stressful for him.

When he graduated from college he tried to help on the farm. Unused to the work and not agreeing with our father, he taught a year. A teacher's life is filled with stress. He worked in Pueblo and California. Then

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he found his metier as an electronic scientist at Wrights' Field in Ohio.

Social adjustment was hard but his work was brilliant. He was sent to demonstrate methods of work to facilities elsewhere. He developed 3-D television.

My husband abandoned my three children and me. I was awarded separate maintenance. He vanished, so there was no support.

My 30 quarter-hours enabled me to start teaching on an emergency certificate. Standards for certification began rising rapidly, so I cared for my children, taught, and took summer courses, extension and correspondence courses.

At this time, my parents became unable to work the farm productively. The D. and R.G. discontinued the passenger train so they could no longer market their crops. They were not able to drive to town, but my mother learned to drive a jeep to Bridgeport from the farm.

They had to apply for a pension but could not get one if they owned property. They discussed the problem with me. They told me that they recognized how hard I had worked on the farm. They considered it would be half mine, half Bill's.

Since I was not divorced, should I die, my husband could inherit any property I might have. None of us wanted this. They asked if I would approve their putting the farm in Bill's name. They said that he understood the situation. He knew that half was to be for me and my children and "Bill will always do what is right by you." I felt this was true and agreed.

The children and I spent alternate week-ends driving from Gunnison to Bridgeport taking groceries, supplies and mail to my parents. They paid most of the expense.

Since our lives were somewhat nomadic at this time, our ties with my parents and the farm were very [illegible] and they always told us, "This is your home, too."

In the spring of 1958 my father became ill. We drove to Bridgeport to take him to the hospital. Part of the road between the bridge and cable ran along the river edge at that time, and was covered by high water.

With the help of my children and Crafts Black, we managed to get him to my car with great difficulty. He died that day. My brother was in Ohio.

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-3-

At this time, my children and I began working on the farm. We built dams and fences, dug and cleaned ditches, disked, harrowed and planted the field by the cabin to corn and feed for my mother's horses.

We cleared the brush from the lower field with axe, shovel and mattock. The ditch above it had been completely filled with rocks and sand. We rented a ditcher which should have been used with a tractor with a hydraulic lift, but we had only the jeep. It would take too much space to describe the nightmare of those two days, complete with gnats, but we cleaned the ditch. This is just one example of many problems.

We disked and harrowed in winter wheat on about a 10-acre field. We marked and irrigated it--and big flocks of chukars fed on it all winter.

My mother spent alternate years with us and went to Ohio the other years. She encouraged us as we irrigated fruit and nut trees, berries and grapes, and crops. The water must be used to maintain the right.

It was hard, with only hand tools, to get a dam to hold. Finally we hauled in large loads of huge tire carcases. (It was my daughter's idea.) We stacked them several tires high, wired them together, filled them with rocks and cement, and used a heavy plastic to line the wall. It withstood heavy floods very well.

The man who was operating the Bridgeport farm before Mussers bought it sent his hired man up to our dam with a tractor and yanked it to pieces.

Bill Crouch, the water commissioner, came down and saw the damage. He reported to Fred Paddock, the Division Engineer in Montrose. Mr. Paddock was outraged. He sent word to the man that if he ever bothered us again, the sheriff would be sent in to fully investigate. Also, the man would have to make a choice of the two water rights he held: 7½ second feet from the Rio Domingues and 10 second feet from the Gunnison. He would be cut down to 1 second foot for each 40 acres of the 80 acres he had under ditch. One second foot is the legal limit for 40 acres.

When our farm was thoroughly watered it acted as a reservoir. Springs bubbled out all along the lower banks of the fields and flowed back into the creek. Without this, the creek sometimes goes dry. The choice would have to be the river--which would mean expensive pumping. We had no more overt difficulty with the man.

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Bill left Wrights' Field and moved to Denver. My mother stayed with him. She had a fall and several operations and Bill couldn't manage. I used all my accumulated sick leave and week-ends to go to Denver to help. My sons rigged my station wagon as an ambulance and we brought her to my home in Paonia. She was bed-fast for many months. Bill stayed with her while I taught; when I came home, I took over. He would go down to the farm. She died in 1974.

During the time they lived here, my youngest son, Micah and Bill discussed plans for the farm. I offered to buy seeds and trees. My son would help prepare the land and plant things, help get water down, and Bill could do the irrigating. The crops would be shared half and half.

This seemed okay until our mother's death. Then Bill went to the farm and gradually refused all plans for improvement. He was hard hit by her death. Because of his distress and need for solitude we did not demand that he fulfill our parents' wish at this time. We hoped he would become more open to having some one near. Micah offered to tear down an old house Bill owned on another piece of land, raft it down the river and build a separate house so they would not need to share the cabin. Bill would never commit himself on this. I would probably not outlive Bill, but the children could expect to eventually inherit their due. Members of our extended family knew of my parents' intentions, but we have hoped things could work out without having to upset Bill. His life has not been really happy.

The above should explain our interest in the farm and the Domingues area. Now to comment on the alternatives to be considered for it.

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In the past I have supported wilderness and at one time desired it for the Domingues. Since then I have read of and been told by people who have seen first-hand what happens when word is out about a new wilderness. The very values which made it special and unique have been destroyed when crowds of people have rushed in, seeking a new experience.

I've seen first-hand what is already happening in the Domingues with a relatively small number of people using it.

The Bureau of Land Management has made extensive studies of the impacts which the various alternatives would have.

I wish to discuss some of these.

Fire could be a serious hazard in the canyons. What is there to burn? Rocks predominate. Trees, except near stream beds, are sparse in the lower canyons. There is a little brush here and there. Not much danger?

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One summer, my son and a friend went to swim in the creek and I went to turn water down the ditch. I gathered several small thistles from the ditch, put them on a bare spot below the ditch, weighted them with a rock, set them afire, and continued the 3/4 mile to the dam. There was no breeze, but a gentle one sprang up on the way. As I turned the water in and faced down-canyon, I saw big billows of smoke arising. I ran back to the fire. Somehow, the flames had crossed the ditch and raced up the hillside until stopped by the cliff. Then the flames swept on across the hillside toward the cabin.

The boys saw the flames. They had grabbed shovels and we fought the fire for over four hours. Had the water not arrived, we would have lost. Great cottonwoods along the ditch burned, and logs built into the ditch bank. All this had spread from tiny sparse grass blades and tiny bushes that were barely noticeable.

One careless match could set a whole canyon ablaze, endangering people and wildlife and destroying the fragile plant life that prevents erosion. The ash and eroded sand would add to the pollution problem.

That sandy soil washes away all too easily. As a child, I saw how rain water would run in little rivulets following tracks I had made. The delicate crust of sand had been disturbed.

The crowds of people brought in by the lure of the word "wilderness," eager to explore each inviting nook, would cause great problems on these delicate hills. Silt would add to the pollution caused by the hikers.

I believe that both farms in the Domingues area have domestic water rights. Most farms today have access to municipal water for domestic needs. In the Domingues the same conditions exist that did in the early 1900's.

In about 1914 these rights helped keep sheep out of the canyon. Neither cows, horses, nor people will drink after domestic sheep. The only thing worse than sheep is the soiled diapers, Kotex and toilet paper thrown in the streams by those who are enjoying the beauties of nature.

Neither farm has access to domestic water except from the Domingues creeks.

Another concern is the Indian petroglyphs. They are irreplaceable. Tourists seem to feel an urge to add to these drawings and "autograph" them.

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People in the BLM have made it clear that they will not have funds or manpower to police the Wilderness if that is the chosen designation.

The local people using the area at present pollute the water (and wilderness beauty) as I have witnessed. They also throw broken bottles into the pools of water so that no one may safely play in them. They tear down and burn cow camps, pull boards from the access bridge to build fires. They shoot at livestock and wild animals. Bill said someone had been shooting near his goats.

The flocks of chukars which abounded for a few years were quickly destroyed when hunters learned about them. With no one at hand to enforce regulations, how long will the bighorn sheep last? How long, when more people come, will the values last that make this area unique?

Access to the area is a serious problem. The present bridge is unsafe. The large timbers at either end are badly rotted on top. My son climbed up to see.

With boards having been ripped from its sides, a sudden gust of wind could toss the bridge and send someone into the river. I've been there in such a wind, but the sides were intact then.

I can easily understand the concern felt by the Musser family in regard to liability.

In view of these problems, in my opinion, the No Action alternative is the most desirable. I would like to see the wildlife increased in the Domingues. The Big Horns are a start. Could (others) be introduced in the upper canyons where trout abound? (Otters)

Since the mining potential is so low, the greatest drawback to this designation seems to be the proposed Star Mesa stock trail across from the falls.

Why do you want to construct such a trail?

The only cattleman who would use it, as far as I can learn, is Crafts Black and he is very opposed to it.

A short distance up-canyon on the same side as the proposed new trail is a branching dry canyon. The head of it has a trail already. I've driven stock up to Star Mesa, and down from it. Most of the cattle coming into that part of the mesa would have to pass it and travel along the rim for about another mile to use the one which will require, you say, 175 feet of blasting.

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There must be better use of tax money than to construct an unneeded, unwanted trail. Or perhaps you could make another project by blocking the existing trail.

Now, I haven't been on that trail for over 10 years--so maybe it is already blocked, but if it is, it should not be as offensive to the view to open it as the proposed one by the falls. Far be it from me to wish to spoil that view, Wilderness or No Action. We should respect the public's right to that view as they toss their garbage over the falls. (Excuse the sarcasm if you can, but some things just don't make sense.)

In the event that the Dominguez is designated Wilderness, why have only the Bridgeport access? This would concentrate most of the people in the lower canyons where the ecosystem is most fragile.

If alternative access points were used, purchase of a right of way through the Rambo farm would not be needed.

In addition to the Bar-X trail from the Uncompahgre, the Leonard Park trail, and the Carson Hole trail which begins at Taylor Ranch, there is already a trail blasted in at Wagon Park and a trail leading down from Wagon Park to one of the side canyons of Little Dominguez. That canyon was known as Monts' Canyon before the BLM renamed the historic places. There is the Wells' Trail from the Escalante, also.

If the people went in at different places, the pressure should not be as great as at only one place, and more of the canyons' scenic beauty would be available.

When reaching a decision on the final disposition of the land, I am sure you will be considering the importance of endangered species. Please remember that the small farmer is an endangered species, too.

Sincerely,

Helen Hyde

Helen Hyde

Signed this 15th day of July, 1985 before me by Helen Hyde.

My commission expires January 11, 1989.

Notary Public
Box 100, Paonia, Co. 81428

SS: County of Delta
State of Colo.

67

Fessler Brothers
2314 J Road
Grand Junction, CO. 81505
July 15, 1985

Forest Littrell, Area Manager
Bureau of Land Management
Grand Junction Resource Area
764 Horizon Drive
Grand Junction, CO. 81506

Dear Sir:

283 We hereby wish to protest the proposed disposal of the Forty (40) acres Number Three Hundred Thirty Two (# 332) on the Grand Junction Resource Management Plan Map Five (5), since this property is currently and has been for a great number of years, used by livestock producers in the Glade Park/Pinion Mesa area on which rest stops and occasional overnight stops are made, while trailing livestock.

The BLM 40 is more specifically described as the SENE, Section 24, T.12 S., R.103 W., located approximately seven miles West of the Glade Park Store.

Barbara J Gleason
Allen Price
Earl Pabst
Lee Swinney Jr
Carl A Hauck
William J Lee
Leroy Hawley
Raymond E Pabst
Jeff Stutz
Louis Berrogel

TZ Ranch By Bud Rinaldo
By J. T. Owen

- 1 -

68

Fessler Brothers
2314 J Road
Grand Junction, CO. 81505
July 15, 1985

Forest Littrell, Area Manager
Bureau of Land Management
764 Horizon Drive
Grand Junction, CO. 81506

Dear Sir:

162 In reviewing the Grand Junction Resource Area, Resource Management Plan, of 1985 we find that the lines drawn for the proposed expansion to the Wild Horse Area boundary includes Forty (40) Acres of private land owned by the Fessler Brothers. This land is more specifically described as being in the NW 1/4 of the SW 1/4 of Section 26, T.9 S, R.100 W. of the 6th Principle Meridian.

We request that you exclude this private land from the proposed expansion to the Wild Horse Area boundary.

We were issued a document in the year 1974, which stated that from that time forward, Fessler Brothers would not be deprived of any future grazing due to the Wild Horse Area.

163 We therefore request that there be no loss of grazing for Fessler Brothers due to the proposed expansion of the Wild Horse Area.

Sincerely,

Fessler Brothers By Jason R Robinson

Fessler Brothers

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Fessler Brothers
2314 J Road
Grand Junction, CO. 81505
July 15, 1985

Forest Littrell, Area Manager
Bureau of Land Management
Grand Junction Resource Area
764 Horizon Drive
Grand Junction, CO. 81506

Dear Sir:

284 Fessler Brothers propose a trade of land with the Bureau of Land Management. Fessler Brothers wish to trade Forty (40) Acres of private land, presently owned by themselves, (described as the NW 1/4 of the SW 1/4 of Section 26, T.9 S, R.100 W. of the 6th Principle Meridian) for Forty (40) Acres of BLM Land, presently part of the "Fessler Allotment, Number 6113" (described on the 1985 Grand Junction Resource Management Plan Map Number Five (5) as Disposal Tract Number Thee Hundred Thirty Nine (# 339) in the NW 1/4 of the NE 1/4 of Section 9, T.14 S, R.103 W. of the 6th Principle Meridian.

We believe this trade to be beneficial to the Bureau of Land Management since the Forty Acres owned by Fessler Brothers is adjacent to the Wild Horse Range and the trade would create for the Bureau of Land Management one contiguous unit of public land, with no private land between the Wild Horse Range and the lower rims of the "proposed" Wild Horse Range.

We believe that the Fessler Brothers should be entitled to first priority in obtaining the Forty (40) Acres, Number Three Hundred Thirty Nine (339), administered by the Bureau of Land Management and listed for disposal. It is an isolated tract of land bordered on two (2) sides by Fessler Brother's private land and is currently and has been a part of the "Fessler Brother" permit (# 6113) for a considerable number of years.

Sincerely,

Fessler Brothers By Jason R Robinson

Fessler Brothers

READEX FICHE

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Fessler Brothers
2314 J Road
Grand Junction, CO. 81505
July 15, 1985

Forest Littrell, Area Manager
Bureau of Land Management
764 Horizon Drive
Grand Junction, CO. 81506

Dear Sir:

In reviewing the Grand Junction Resource Area, Resource Management Plan, of 1985 we find that the lines drawn on Map Number Four (4) contain several more errors, besides the one pointed out in the accompaning letter concerning the Wild Horse Area.

304 The upper portion of Tract Forty-Eight (48) in T.8 S, R.99 W., is included as a part of Commercial Forest Land.

A large portion of the S 1/2 of the SW 1/4 of Section 2, T.9 S, R.100 W. is included as a part of Recreation and an area of Critical Environmental Concern.

A portion of the S. 1/2 of the SW 1/4 of Section 10, T.9 S, R.100 W., is included as a part of the Threatened and Endangered Species areas.

197 Most of the land in Sections 28 and 29 T.9 S, R.100 W., are included as travel being Limited to Existing Roads and Trails. Concerning this designation specifically, Fessler Brothers agree with it to the extent that it is their desire also, to limit the public destruction of grazing and personal property located in this area. However, in gathering, tending and moving livestock in this area, and on the adjoining permit, it is sometime imperative, for the control of said livestock to leave existing roads with vehicles. We feel therefore that this designation should be based on reasonable conditions for use, off of designated roads.

We request that the Bureau of Land Management correct these errors in each of the above instances. We feel that the RMP final draft should not include management by the Bureau of Land Management of any of the Fessler Brothers' private land.

Sincerely,

Fessler Brothers

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ARCO Exploration Company
Exploration Operations - Western U.S.
707 17th Street
Mailing address: P.O. Box 5540
Denver, Colorado 80217
Telephone: 303 575 1000

July 15, 1985

Mr. Forest Littrell
Bureau of Land Management
Area Manager
Grand Junction Resource Area
764 Horizon Drive
Grand Junction, CO 81506

Re: Grand Junction Draft Resource Management Plan and Draft Environmental Impact Statement

Dear Mr. Littrell:

Atlantic Richfield Company appreciates this opportunity to comment on the Draft Resource Management Plan and Draft Environmental Impact Statement for the Grand Junction Resource Area in western Colorado.

We commend the Grand Junction Resource Area Planning Team on preparing one of the most comprehensive, well written plans we have had the opportunity to review. It is apparent that thorough consideration was afforded all resource values existing on the Resource Area as evidenced by the manner in which the management decisions are presented in the planning document. The Grand Junction Resource Area has illustrated that energy and mineral resources can be integrated into the planning process and that specific management decisions can be made even though the resources themselves are, in many cases, unknown or difficult to project.

With regard to the process, we were particularly impressed with Chapter 4, Environmental Consequences. This chapter illustrates the impacts on each resource resulting from the various management decisions set forth in all the management alternatives, including the proposed action. In relation to other plans we have reviewed, this is the best treatment and methodology we have seen regarding impacts on individual resources by alternative. Comprehensive treatment of these issues can only help to support the plan should it be challenged on the basis of National Environmental Policy Act requirements.

We support the inclusion of Appendix C, Standard Design Practices, which identifies specific requirements pertaining to operations. This information provides the operator a tool with which to plan specific activities in terms of time, money and personnel. Further, the fact that these standards are flexible and at the discretion of the authorized officer indicates BLM's willingness to work with industry in an effort to arrive at the most equitable agreement regarding exploration and development activities on a case-by-case basis.

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Mr. Forest Littrell
July 15, 1985
Page 2

While it is probable that one of the reasons the Grand Junction Plan contains such comprehensive consideration of energy and minerals is due to the fact that there is current energy and mineral production taking place, we believe that every resource management plan should give the same in depth analysis to these resources. It is illustrated that BLM conducted a trade off analysis between surface and subsurface resources. Nevertheless, BLM has seen fit to go a step further by designating certain areas with a management emphasis dedicated to energy and mineral activities. This is appropriate in a plan which adequately addresses all resource uses within a planning area.

In conclusion, we support the Proposed Grand Junction Resource Management Plan and accompanying Draft Environmental Impact Statement. We fully agree with the concept that energy and mineral resource uses are compatible with other more sensitive resource uses and needs. The fact that industry is willing to reasonably mitigate any adverse impacts associated with energy and mineral activities is made clear in the proposed plan, as are federal mitigation and protection requirements. This information will give the public at large a better awareness of how energy and mineral activities interface with other resource uses.

It is obvious that the Grand Junction BMP Planning Team was willing to take the time, effort, and money to do an extraordinary job of planning for these public lands. We appreciate this effort and hope that other planning activities are tailored after this planning effort, particularly other Resource Management Plans and Forest Service Land and Resource Management Plans.

Sincerely,

C. M. Moseley
Public Lands Analyst

cc: Mr. Kannon Richards - State Director

70

United States Department of the Interior
OFFICE OF SURFACE MINING
Reclamation and Enforcement
BROOKS TOWERS
1020 15TH STREET
DENVER, COLORADO 80202
JUL 15 1985

MEMORANDUM

TO: Forest Littrell, Area Manager
Grand Junction Resource Area, Colorado
Bureau of Land Management

FROM: Mel Shilling, Chief
Mining Analysis Division
Western Technical Center

SUBJECT: Grand Junction Resource Area Resource Management Plan and Environmental Impact Statement (RMP/EIS)

We have reviewed the draft RMP/EIS for the Grand Junction Resource Area and are submitting comments and suggestions (attached) for your consideration. We appreciate this opportunity to participate in the review of the document and look forward to seeing the final RMP/EIS.

If you have any questions concerning these comments or any other matter relating to the RMP/EIS, please feel free to contact Floyd McMullen in Denver at (303) 844-5637.

Attachment

70

OSM REVIEW OF THE DRAFT RMP/EIS FOR THE GRAND JUNCTION RESOURCE AREA

Comments/Suggestions:

166 Page 46, paragraph 2 (cultural resource management). Please define "active management" and "actively managed" as they relate to cultural resources, either here or in the glossary. Use of these terms throughout the EIS raises many questions that could cause confusion to the reader. Areas that contain prehistoric and/or historic sites are either managed or they are not managed. Should the reader assume that if some sites are "actively managed" others are "passively managed"? Also, we find occasional clues that "active management" may involve site disturbance as well as site protection. If archeological investigations are being contemplated, the text should clearly reflect that management strategy.

167 Page 131, paragraph 6 (cultural resources). Please reevaluate the use of the terms "archaeological" and "historical," here and throughout the rest of the EIS. Nomenclature in common usage precludes the use of the term "historical" with regard to cultural remains identified with written history. If the site being studied reflects the period that began with the advent of recorded history, the operative term is "historic." The term "archeological" is properly used to identify cultural manifestations whose investigation involves the use of archeological method and techniques; it is not peculiar to prehistoric sites. If the site, whether prehistoric or historic, is being investigated by archeologists, it becomes an "archeological site."

104 Page 146, paragraph 10 (impacts on air quality). Please define "mechanical and burning vegetation manipulation practices" either here or in the glossary for the convenience of the reader.

169 Page 137, paragraph 7 (impacts on cultural resources). Please reevaluate the statement that "research would continue to be mainly project salvage initiated, and not necessarily scientifically oriented." Experienced archeologists would argue that archeology by definition is scientific and that archeology is conducted scientifically by scientists or it isn't archeology. They would also argue that "salvage archeology" not only must be conducted scientifically, it must be "problem oriented. Also, please reevaluate the use of the term "cultural resource management." Cultural resource management may involve archeological research, 168 but it should never be taken to be synonymous with archeological research. It is, by definition, the management of cultural resources.

105 Page 165, paragraph 5 (impacts on air quality). Please define "vegetation manipulation practices" either here or in the glossary for the convenience of the reader.

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gordon engineering INC.
P.O. Box 3628, Grand Junction, Colorado 81502
Office (303) 245-1989 Residence (303) 243-9609

July 17, 1985

Bureau of Land Management
Grand Junction District
764 Horizon Drive
Grand Junction, Colorado 81506

Re: Comments on Proposed Draft RMP for the Grand Junction Resource Area.

Gentlemen:

After reviewing a copy of the proposed Resource Management Plan for the Grand Junction Resource Area, the following are our comments regarding this document.

44 First, it is my understanding that this document is to be used as a guideline in managing the public land within the Grand Junction Resource Area and is to be used for resolving the multiple use conflicts should all other means of arbitration fail. The RMP is to be amended at any time a need arises and is to be a guideline and not a regulatory document. The particular section on Oil and Gas Management in the preferred alternative reads more like an ultimatum rather than a guideline.

45 Several general stipulations and standard design practices have been included with what we believe appears to have been little consideration given to the cost versus the benefits derived to the Directive. To elaborate further, under the general stipulations, we note that an increase in the amount of No Surface Occupancy (NSO) is proposed. Some of these lands are within existing federal oil and gas leases with existing wells. Under the terms of the leases, a certain amount of development is required, particularly in unitized areas, and it appears that little or no thought has been given to the existing obligations. It is our suggestion that all the NSO areas be reviewed again with all existing obligations included.

40 Next item is the steep slope stipulation; it is unacceptable as written. The majority of the oil and gas activity in the Grand Junction Resource Area is in mountainous terrain and canyonlands. In certain areas, this would eliminate most of the leases and activity. Certainly, there are areas where unacceptable impacts may occur; however, these should be considered on a case by case basis rather than using a blanket statement. Revising some of the wording to state "That in areas where slopes are greater than 40%, surface activities will be reviewed for mitigation impacts."

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46 Threatened and Endangered (T & E) Plant and Animal Habitat stipulations are unnecessary since the existing regulations cover these. If the BLM leases an area with known T & E plants and animals and receives rentals from the lands, why should the operator be required to hire a botanist or a biologist to study these prior to any surface useage? From experience, the only recognized people qualified and approved by the BLM are a small group who charge exorbitant fees. This oligopoly has been created by the BLM system and is extremely unfair to the operator.

43 Under Standard Design Practices, it appears that these have been taken from general guidelines and put into this catagory by individuals who are not qualified in the oil and gas area. Several items we note are in direct conflict to existing regulations and seem to be arbitrary in nature. Certain items like compaction of culverts plus paying an engineering firm to run compaction tests does not insure any better integrity of small diameter culverts. For any culverts five feet or larger in diameter, this certainly should be considered.

47 After reviewing the requirement for chemical toilets and hauling of the trash, those items are a great expense to the operator and should be reviewed on a case by case basis. A short term well (less than 60 days) does not justify the expense of these items. We suggest that the BLM try finding a sanitation service who will service drill rigs. A sanitation hole works much better than squatting in the trees because the chemical toilet hasn't been cleaned. Trash baskets are 48 a good trash collector, but their removal and replacement costs several hundred dollars each trip and trash is generally scattered along the access road when it is hauled out full of trash. Why can't a trash receptacle be used which can be burned when it gets full?

The design practices concerning reserve pits seem to contradict each other and certainly any hazardous wastes as defined by the Environmental Protection Agency 49 should be removed. One question that remains, removed to where? There are several waste disposal sites around; however, their permits probably will not allow disposal of any hazardous wastes. Most of these will allow only drilling mud and produced water. Drilling mud generally is difficult to haul since it is not loaded into a vacuum truck easily and most of the time it certainly will not dry up within a year. Again, this portion needs to be reviewed and a general guideline presented.

In summary, let me reiterate that this document is to be used as a guideline in managing the resource area and resolving any conflicts in multiple use and is not intended to be a regulatory document. Therefore, we encourage its complete review and any items changed which are not in this context. We all know as administrations change, the original intent of certain items gets lost and it is our responsibility to see that this document is written in such a way that its original intent is not lost.

71

We certainly appreciate the problems that the BLM encounters in managing federal lands; however, imposing more and more restrictions on industry such that further development will not be economically feasible is counter-productive. The Federal Oil and Gas Program is the largest income producing entity other than income taxes for the federal government. Many operators at this point are dropping their federal leases due to the burdensome regulations which seem to be increasing at an astounding rate.

In order to help, I am sure that a number of industry personnel would be willing to assist in developing their particular portion of the RMP. This will insure the people with expertise in their respective fields can be utilized.

Very truly yours,

John I. Gordon
JIG:sr
CC: Mr. Cannon Richards
State BLM Director

72

Bureau of Land Management
Grand Junction Resource Area
764 Horizon Dr.
Grand Jct., Colo. 81501

Re: Comments on Grand Junction Resource Area Management Plan and Enviromental impact statement March 1985.

Dear Sir,

D & G Roustabout Service would like to submit the following comments on the management plan and enviromental impact statement draft.

General:

1. Of the four alternatives for management of the Grand Junction Resource Area, we recommend selection of the prefered alternative (PA) for future management of Federal lands in your area.

2. We agree with your proposals to acquire public access to public lands and to drop the Little Bookcliff and Desaree Canyon Wilderness study area.

Oil & Gas Leasing:

38 1. No surface occupancy (NSO). We feel that this should not be a stipulation. Land designated as NSO should not be part of a lease, and rentals or royalties should not be paid on this land.

40 2. Steep slope stipulations are unrealistic in our area. We feel that this should be deleted and alternate means used to protect these areas.

Standard Design Practices (SDP) :

42 1. Requirements to remove all wood over 4" in diameter from federal land should be changed to allow scattering outside of the cleared area. This should help keep wood cutters from driving off the road.

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Page # 2

50 2. Recontouring disturbed areas should be based on improvement to the land that can be made such as retention of topsoil, drainage, increased wildlife habital etc, rather than original land contour.

Thank you for the opportunity to comment.

Greg Andrews partner
D & G Roustabout Service

73

FRIENDS OF THE EARTH
P.O. Box 728
Palisade, CO 81526
(303) 464-5329

July 17, 1985

Mr. Forest Littrell
Bureau of Land Management
Grand Junction Resource Area
764 Horizon Dr.
Grand Junction, CO 81501

Dear Mr. Littrell:

Please accept the following comments on the Grand Junction Area Resource Management Plan on behalf of the Friends of the Earth. In reviewing the many resource issues in the RMP I have focused on several areas in which FOE has interest and expertise. Given my involvement in the citizen's alternative and continued communication with the Colorado Open Space Council on this issue, I support by reference the July 9, 1985 comments by the Colorado Open Space Council on the the following issues of Wilderness; Rivers; Recreation; Land Disposal; Oil and Gas Leasing; Access (Transportation); Visual Resources; and Comments on Appendix K, Oil and Gas. I have no comments at this time on the following resources issues: Wild Horses; Cultural Resources; Paleontological Resources; and Fire Management. All comments are directed at the preferred alternative unless otherwise noted.

Organization

Generally I found the Draft RMP to be well-written and the editorial quality admirable. It is well-organized within sections; the charts and comparisons are generally adequate, but the maps are somewhat inadequate due to the generality of the legend (especially regarding recreation and mandatory protection areas). There were few cross-references in the text on the alternatives vis a vis maps, and no clear indications in the table of contents regarding correlating text to the maps. I finally found a partial explanation in the appendix on "alternative formulation" and in chapter 2 "management of emphasis areas." Perhaps a revision of the table of contents, ie. less planning jargon, could be done for the final RMP, and better references to maps and appendices should be included throughout the text.

Alternatives

305 While the alternatives are more clearly defined and documented and certainly much more specifically formulated and explained than other RMP's that I have reviewed, I found the preferred alternative on several issues did not include aspects from all of the other alternatives, thereby providing a "rational and balanced approach to public land management." (RMP, Page 7.) More specific suggestions on how to balance the preferred alternative will be described below. Additionally, aside from the coal and wilderness suitability analysis, the RMP did not consistently offer a rationale for a number of

198 choices made for the preferred alternatives. For example, there's no rationale for allowing extensive off-road vehicle use in some areas that were deemed sensitive for other resource reasons.

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Air quality

6 Air quality protection appears to be given lip service only. The enviromental consequences section notes that "vegetative manipulation" would have required management stipulations and that limiting ORV use would decrease emissions in the Mesa County non-attainment area. However, there are no associated proposed actions in the Summary of Management Actions. I recommend inclusion of better information in anticipated emissions levels for vegetative manipulation and appropriate management actions. Additionally, I strongly support limitations on ORV use in the non-attainment area on at least a seasonable basis, ie. avoiding inversions. The participation of BLM in a baseline analysis and cooperative effort with other agencies regarding air quality issues should be strengthened given that BLM is granting crucial right of ways to major energy projects expected to be large emissions sources, eg. Chevron Oil Shale.

Soils and Water Resources Vis a Vis Grazing, ORV Use, Oil and Gas Development

Due to our concern with regional soil and water resources, I was impressed by the RMP's acknowledgement of the extensive soils, erosion, and salinity problems in the resource area. Restrictions on development on areas such as Baxter Pass and slopes over 40% make eminent sense. Check dams and restoration of stream banks and highly eroded areas like Cactus Park are also laudable. However, restoration and rehabilitation will have short-lived effects if the root causes of erosion and sedimentation continue. In my observation, ORV use and oil and gas roads, but particularly grazing practices, are responsible for much of the deteriorated soils condition in the resource area.

The draft RMP acknowledges the connections between erosion and decreasing water quality and these resource uses through brief references. The only substantive recommended management action is closure of some ORV routes and discouragement of "cross-country" ORV use. Given the extent of the erosion problem, especially in the Bookcliffs Range, it is doubtful whether these limited closures will have major effects. I suggest more extensive closures be seriously analyzed and recommended enforcement actions included for all proposed closures. I encourage the BLM to work with ORV user groups to educate their members.

I have similar doubts as to whether lease stipulations on oil and gas operations are sufficiently enforceable to minimize soil erosion and water impacts; I have seen apparently unauthorized road "improvements" as well as lack of reclamation on well sites. I realize the RMP is a planning document, not an enforcement manual; however, the best approach is a preventive one bolstered by a planning document dedicated to sound enviromental practices. This means in some cases there should be no development in sensitive areas. This RMP is obviously biased towards oil and gas development, in no other RMP have I seen the detailed manipulations to make sure oil and gas leases can

199 continue to occur in spite of other resource uses or environmental problems; no-surface occupancy stipulations are simply insufficient to decrease the impact of oil and gas. The RMP also should acknowledge that oil and gas roads open up the backcountry to more public use, especially ORV use destructive to

38 soils, vegetation, and eventually water quality. I recommend this particular aspect be addressed in the RMP in regards to future potential oil and gas leasing areas. I also recommend that all river corridors; other major

38 riparian resources; sensitive plant species habitat; and the wild horse range be specifically designated no leasing, rather than relying on NSO stipulations (pp. 33-36).

Since the RMP acknowledges the watershed protection associated with wilderness designation, it is inconsistent to recommend wilderness areas elsewhere in the resource area but not in the Bookcliffs area which obviously contributes to the erosion/salinity problem in the Grand Valley, therefore, I suggest that at least one wilderness area be recommended in the Bookcliffs area. All in all, my recommendations would place only a small additional percentage of lands off-limits to one specific resource use.

Regarding grazing, the RMP acknowledges that it makes some contribution to the erosion/salinity problems, but the analysis, substantiation, and specific recommendations are quite weak. First of all, even though there is a Grand Junction Grazing Environmental Statement it should not simply be referenced and the comparison of grazing allotments with RMP recommendations be deferred until grazing allotments are reviewed. Existing AMP's (current practices) should be reviewed now in the context of the RMP management recommendations, so that "new grazing decisions will be issued following completion of the recorded decision" (p.15). Given the importance and impact of grazing in the resource area, and in order to meet NEPA requirements, grazing must be evaluated relative to other resource decisions. Secondly, as
158 with oil and gas, there is an over reliance on management techniques which are difficult to enforce combined with a bias of allowing grazing in nearly the entire resource area. I recommend that more substantive restrictions on grazing, particularly in riparian areas, steep slope-desert areas, and sensitive plant habitat areas be analyzed and recommended in the RMP. BLM should also look at working through the Grazing Advisory Council to explore flavory grazing methods in the more erosive parts of the resource area; west Mesa County, especially north of the Colorado River towards Douglas Pass, definitely needs better grazing controls. I recommend a book, Desertification in the United States, Council on Environmental Quality, Washington, D.C., 1979, as an excellent sourcebook on the connections between overgrazing and erosion/salinity.

Locatable Minerals and Minerals Materials

Regarding locatable minerals the preferred alternative is obviously deficient since it only withdraws primarily Ruby Canyon and the 3 recommended wilderness areas. The protection alternative, in this instance, is our recommendation, but at a minimum the BLM should consistently offer the same protections to the Gunnison and Dolores River Canyons as it does to Ruby Canyon. The special management areas in total constitute a very small percentage of the land base of the resource area and should also certainly be withdrawn to minerals development.

In terms of minerals materials, I have stated previously in comments on
71 criteria that the BLM should not be in business of encouraging and selling materials. There is sufficient gravel and other materials available on private lands, including many area operations in the state of abandonment. It does not make sense for the BLM to undermine the local market by making it cheap and convenient for someone to open more mines. Therefore, I recommend the BLM drop the program, or in lieu of that option, adopt the protection

71 alternative, plus closure of Grand Junction and Jerry Creek sites, and all special management areas listed in table 2-17.

Coal Leasing

The amount of acreage considered for coal leasing is essentially the same in 3 alternatives which betrays a lack of analysis of other resources; I recommend the RMP develop a better range of reasonable alternatives to comply with NEPA requirements. I support the restrictions on leasing in the Palisade Water shed; however, the 100 foot buffer zone to protect riparian habita. and
27 the potential stipulations to protect threatened and endangered species are far from adequate in terms of habitat protection. The multiple-use tradeoffs screen simply deletes all of the other resources as less important than coal; please explain how this was determined. In sum, the coal section needs more analysis than simple adherence to the unsuitability criteria to make the RMP applicable to specific issues in the resource area. The preferred alternative is clearly the commodities alternative: it needs to be re-analyzed and balanced in terms of other resources, especially endangered species habitat and the Little Bookcliffs area.

Forest Management

I certainly agree with the concept of targeting specific areas for
75 harvest under the Preferred Alternative. At this time, due to the lack of a timber capability classification study it is impossible to comment on the acreage to be commercially harvested since my recommendations would primarily depend on location and access issues. The RMP should give an indication of when the study will be finished and implemented.

Regarding firewood harvest the preferred alternative appears reasonable, but I would recommend more evidence as to how the 2,800 cords level was arrived at in terms of harvest. Given the increasingly severe air pollution problem in the Grand Valley, which is partly due to wood-burning, the RMP
76 needs to consider that providing cheap, accessible firewood acts as an incentive for more wood burning, thereby negatively impacting public health; compliance with federal air quality standards; and visibility of vistas from and on public lands. These impacts should be analyzed relative to the proposed harvest level. The RMP is not very specific in either the text or maps regarding the location of firewood cutting areas. Is this also to be determined on the basis of a forthcoming classification study?

Lastly, the impacts from roads built for both commercial and firewood
77 cutting are briefly mentioned. The location of proposed roads needs to be specified in the RMP, and a benefit-cost analysis of new roads via a via timber sales should also be included before any specific actions are recommended for cutting.

Wildlife

Overall the preferred alternative is acceptable. I presume it was developed in conjunction with the Colorado Division of Wildlife and U.S. Fish and Wildlife Service and proves acceptable to these agencies. While I generally agree with the level of management aimed at increasing the deer and elk herds throughout the resource area I have some qualifications. One,it should not be done at expense of habitat management for non-game and

106 threatened and endangered species. Two, there are areas which already have sufficient populations. Specifically, BLM land in the Watson Creek Drainage abutting East Orchard Mesa is an over-browsed area where the deer herd has moved down to adjoining orchards and become an extreme nuisance and expense to both landowners and the DOW. The BLM should consider improving forage and/or decreasing the herd size. Lastly, I strongly support proposed protection of
256 riparian areas, and was shocked that the BLM would consider such a prime area as Skipper's Island for disposal. In lieu of transfer of this area to the DOW the BLM should consider alternative management actions in the RMP.

Threatened and Endangered Species and Management of Special Areas

Compared to other RMP documents the sections on T and E species are quite outstanding in breadth, but they do need to be improved in terms of analysis and readability. First of all, the text does not refer to appendix F which curtails one's analysis. Appendix F. Alternatives should be utilized in comparison of alternatives sections (see p. 66) to better describe and compare actual habitat areas/acreages. (By the way, where are T and E species on the maps?) Secondly, the narrative needs more explanation of the basis for the preferred alternative recommendations, ie. analysis and decision points, for
150 the habitat management plan and special management areas. For example, in appendix F, Table F-3 1,280,060 acres are allocated in the protection alternative and the identical amount in the preferred alternative in F-4. Yet the key species emphasized for management shifted from inclusion of T and E species and unique plant communities to a remarkably heavy emphasis on game species in the preferred alternative. In sum, the preferred alternative is very close to the commodity alternative and obviously biased to game species as a commodity, thereby deleting management action for other resources. The preferred alternatives, for the management, special areas, and habitat management plans need to be re-done in terms of balancing protection for sensitive plants and communities.

There is also an over-reliance on recommended wilderness designations and
151 no-surface occupancy stipulations to protect T and E and sensitive species. These are laudable measures but again do not give sufficient management attention to these very unique, and in a sense non-renewable resources. More
152 acreage needs special protection. For instance, Pyramid Rock and Unaweep Seep have very small acreages recommended as RNA's and unsuitable for utility corridors and mineral materials. I suggest that larger buffer zones for these areas be analyzed and included in the RMP. Additionally, the impacts of grazing and ORV use on these 2 areas plus all other special management areas should be quantified, and recommended protective measures be included in
111 proposed management actions. Badger Wash was deleted for ACEC designation, when in fact it should be upgraded to RNA designation in the preferred .pa alternative to protect its unique plant species and community. Rough Canyon is a good choice for a proposed RNA and should be analyzed for expanded acreage.

153 I thoroughly disagree with how public utilities restrictions (pp. 61-62) were applied to T and E species. I recommend that all categories in T and E species be placed in the "unsuitable" classification.

Public Utilities Management

The entire approach has improved greatly over the original proposals. With a few exceptions (the T and E species mentioned above and my concurrence with CDOC over wilderness recommendation) the recommendations on pp. 61-62 are specific and sensible. The proposed corridor recommendations are acceptable; it is unfortunate, however, that BLM will have processed several major corridor requests for right-of-ways before the RMP will be applicable.

Thank you for the opportunity to comment throughout the RMP planning process. Overall, the RMP appears to be one of the better BLM planning documents I have reviewed. I am confident the BLM will take the recommendations of Friends of the Earth and other environmental groups and utilize them to develop more balanced approach in the final preferred alternative. If the final RMP is acceptable, FOE is prepared to support the necessary budget increases for enforcement and and management personnel to implement the RMP.

Sincerely,

Connie Albrecht

Connie Albrecht
Colorado Representative

CA:cac

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July 14, 1985

Mr. Forest Littrell
Area Manager
Bureau of Land Management
764 Horizon Drive
Grand Junction CO 81506

Dear Mr. Littrell:

285 The following is a submittal of a request for the classification of land described on attached list ~~sheet~~ as a Category II, Disposal Tract. We feel this land is free of the concerns listed that would identify it as a Category I, Retention Area. (Pages 19-20 of the March 1985 draft Grand Junction Resource Area Management Plan.)

We feel that this land can qualify for Category II classification in that:

1) It is proximate to Palisade and more directly borders East Orchard Mesa agriculturally developed land.

2) Commercial agricultural use would very conceivably be the highest, most appropriate use of this land.

3) The impact to local and area government would be beneficial primarily due to increased tax revenue.

4) The impact to local and area economy would be beneficial primarily due to an increased production and employment base.

We are a longstanding and commercially viable farming entity and do have at our disposal the resources necessary to develop this area into productive fruit land. We would like the opportunity to purchase this land.

Sincerely,

Charlie Talbott

Charlie Talbott
Vice President,
Talbott Farms Inc.

74

Charlie Talbott

Ute Principal Meridian

T. 1 S., R. 2 E.

Section 10: E½ NW¼, SW¼ NE¼, NE¼SW¼ and N½SE¼.

Section 15: SW¼NW¼ and SW¼;

Section 16: SE¼NE¼, N½SW¼ and SW¼SE¼.

75

Audubon Society of Western Colorado

Forest Littrell
Area Manager BLM
Grand Jct. Resource Area

July 1 1985

Dear Sir:

The following comments from the Audubon Society of Western Colorado should be considered as public comment on the BLM Draft Resource Management Plan and Environmental Impact Statement (RMP-EIS) for the Grand Jct. Resource Area. Please include these comments in the public record.

First we would like to thank the Grand Jct. resource office and personnel for writting a plan which is concise overall and readable. The information is accessible and fairly easy to decifer. Also we would like to thank you for being open, cordial and fair toward the public during the entire planning process leading up to this document. Overall the plan seems to adequately address the management of these local public lands in an equitable and wise manner. We would like to comment on a number of issues addressed in the RMP-EIS, beginning with rivers.

Rivers

We support the wild recreational emphasis for Ruby and Horsethief Canyons on the Colorado River. It certainly would be appropriate to manage the area according to scenic river designation criteria, to the extent possible.

We would recommend that the Dolores River Canyon west of Gateway to the confluence of the Colorado be similarly managed. A one quarter mile corridor along this segment should be closed to mineral location, as you recommend for Ruby and Horsethief canyons. Both of these river segments received suitable recommendations for wild or Scenic River designation in the Colorado and Lower Dolores Rivers Wild and Scenic river study and FEIS prepared by the National Park Service in 1979. The lower Dolores River qualifies for scenic or wild river designation and should be managed to preserve those qualities.

177 The recreational emphasis on the Gunnison River Corridor is

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appropriate. Hopefully Congress will recommend a wild and scenic rivers study on that river section in the near future. As you state on page 132 in the RMP this river has attributes suitable for scenic or recreational river designation. The BLM as a land management agency should encourage congress to designate this section as a study river. In the interm we would highly recommend the BLM manage that river segment to preserve Wild and Scenic qualities.

Recreation

We are pleased with the recreational management proposals for this resource area. In particular we would like to compliment you on the Special Recreation designations for the Grand Valley including the OHV closure on Mt. Garfield, the semi-primitive non motorized designation for Granite Creek, the scenic and natural emphasis on South Shale Ridge, the NSO stipulation for the Gunnison River Canyon, the semiprimitive non motorized recreation and VRM classII designations for Hunter/ Garvey Canyons. We are particularly glad to see the Bang's canyon/ Northeast Creek area managed for recreation. This area is very close to Grand Jct. and maintaining the recreational opportunities and visually pleasing (VRMI) aspects of the area is important.

Archeological and Paleontological Resources

Thank you for the designation of a paleontological site in Rabbit Valley We are glad to see some recognition of paleontological resources in the area. This is a significant site and we support protecting and developing the site for research and education.

166 You recommend eight archeological sites for active management. There are 134 known sites of high value in the area. You propose no protective measures for these sites. If that is the case how are these sites to be protected from the recently well publicized threat from thieves and vandals? The Indian Creek site should be expanded to preserve the integrity of the site. Important resources were left outside the protected area.

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Wildlife

Overall your management for wildlife is commendable. The protection of habitat, in particular, riparian habitat seems to be a high priority in this plan. We are very pleased to see that the management actions you propose would increase protection overall for threatened and endangered species.

Special Management Areas

256 Eight sites in the resource area were proposed for ACEC designation in the RMP. None of the eight received a recommendation for ACEC designation in the preferred alternative (table 2-17 pg. 55). In fact Skippers Island went from ACEC consideration to a recommendation for disposal under land tenure adjustments. It does not seem prudent to dispose of an area which is recommended for ACEC designation in both the commodity and protection alternatives. The other 7 sites would receive some protection through other designations and managment prescriptions. South Shale Ridge has gone from an appealed roadless area with good wilderness characteristics to an area that does not even qualify for NSO drilling stipulations. The lease stipulation (2) which has been proposed for the area do not provide any specific protection. We would like to see the scenic values of South Shale Ridge protected by ACEC or ONA designation.

187 We are pleased with the 6 RNA recommendations in your prefered alternative.

Wilderness

Sewemup Mesa

Thank you for the suitable recommendation for the Sewemup Mesa WSA. The visual and recreational values of Sinbad Valley have also been recognized in the RMP. Now both the mesa and the valley will be preserved for their obvious scenic and recreational values.

205 The Palisade

The Palisade WSA should be recommended as suitable for wilderness designation. It is obvious from the RMP and past inventory studies that this area has many outstanding wilderness qualities. The diversity, spectacular and unique assets of the area are well documented in your own studies of the area. On page 305 under the PA section for the Palisade you have written that, ' configuration, steep slopes and potential trespass problems prevent the unit from being recommended for wilderness in this alternative.' You also list a conflict with 797 acres of Pinyon Juniper woodland.

Configuration, in and of itself, certainly should not exclude the area from becoming a wilderness area. We have many odd shaped wilderness areas. The steep slopes rational is really confusing. Are steep slopes out of character for a wilderness area? Last but not least is the trespass problem which you have already found a solution to in suggesting the acquisition of trail right of ways through adjacent private lands. We have been informed that trail access will be acquired for recreation purposes. So trespass certainly does not seem to be a problem. Pinyon Juniper woodlands are plentiful in this Resource Area and 797 acres of this resource definitely should not preclude wilderness suitability. ORV use seems to be the only real conflict in The Palisade. Checking the PA map it is obvious that ORV use areas are very plentiful in the Gateway area. Surely this WSA can be closed to ORV use without significantly reducing ORV use opportunities in the area. Potential managability problems concerning vehicle use in the western and southern portions of the WSA could be dealt with by making it impossible for people to drive up the wash bottoms into the area. Blocking the wash bottoms with boulders or trenching are ideas to prevent vehicle use. If the area were designated wilderness most people would respect the fact that the area would be closed to vehicle use and take their vehicular activities elsewhere. We support the All Wilderness alternative for The Palisade WSA.

Dominguez Canyons

We are glad to see a suitable recommendation for The Dominguez Canyons WSA. The closure of the cherrystem roads on Star Mesa and up the bottom of Big Dominguez Canyon should protect the integrity of that portion of

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the area. We also hope the land acquisitions described on pg. 347 are possible. We cannot support the 19,495 acre deletion recommended in the PA.

232 In this district deleting 2,642 acres from a wilderness study area for Pinyon Juniper forestry is an unwise use. It certainly would seem that wilderness in this case is definitely a higher and better use under a scheme of multiple use. The wilderness resource is highly limited while the woodlands resource is not. This deletion is not a wise or logical decision. The deletion of 19,495 acres to enhance managability and prevent conflicts with adjacent private lands is of questionable merit. The Maximum Wilderness Alternative recommends expanding the boundaries of the WSA to improve managability and enhance wilderness characteristics. The PA recommends excluding over 19,000 acres to enhance wilderness managability and prevent conflicts, (pages 305-306). If either expanding of contracting the boundaries would improve managability we definitely recommend improvement by expanding. 19,495 acres is a very large amount of land, given the size of most BLM WSAs in the state. Sewemup mesa only has 19,140 total acres.

203 Moving the boundary back along the Gunnison River and Escalante Canyon is being recommended to prevent trespass on private land, we are being told. That idea does not make much sense since private land borders the road in Escalante Canyon and along the Gunnison River. That road and the river will be the access to the area and visitors will want to cross the private lands to get to the wilderness area regardless of whether there is a non wilderness buffer zone or the wilderness area is adjacent to the private land. So the buffer zone idea becomes useless to prevent trespass. After many hiking and camping trips in this WSA it becomes very apparent that the chances of people dropping down from the rims and mesa tops to trespass through private lands to get out of the wilderness area is very remote. The topography of the area does not lend itself to this type of movement. You have suggested acquiring right of way access for trails in

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many other areas in this resource area. Couldn't the same be done in Dominguez? These boundary deletions do not seem to accomplian anything except the elimination of large tracts of highly qualified land from one of the finest potential wilderness areas in the state.

203 Black Ridge Canyons

We are very pleased to see the Black Ridge Canyons and the Black Ridge Canyons East WSAs combined. We never have been in favor of splitting these two magnificent areas. Overall we are very pleased with the suitability recommendation in the PA, and the boundaries recommended. Of course, being hard to please, we did find one significant problem. The cherrystem road going out to the arches in Rattlesnake canyon definitely should be closed. The BLM will probably never have the personnal to patrol that spectacular area. When people can drive to an area they are more likely to vandalize. A case in point is the Bridgeport area at the access to the lower Dominguez area. Coming upon those arches by foot gives the visitor a sense of discovery that the presence of a road and vehicles would completely take away. It is neither a long nor a strenuous walk to the arches from the Black Ridge road. Very few people would be excluded from seeing these arches by foot travel. Those few people unable to walk out to the arches can easily drive to nearby Arches National Park to motor view arches in the same Entrada layer as those found in Rattlesnake Canyon.

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Thank you for the opportunity to review and comment on your RMP/EIS. We hope our concerns and comments will help you in writting the final RMP/EIS. Thank you for your fair attitude and willingness to listen thoughout this management process and wilderness review and study.

Sincerely,

Paul T Petersen
Conservation Chairman

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WALTER S. FEES, JR.
OIL & GAS OPERATOR

2516 Foresight Circle
Room 10
Phone 242-2044
Grand Junction, Colorado 81505

July 12, 1985

Bureau of Land Management
Grand Junction District
764 Horizon Drive
Grand Junction, CO 81501

RE: COMMENTS: GRAND JUNCTION RESOURCE AREA DRAFT RESOURCE MANAGEMENT PLAN & ENVIRONMENTAL IMPACT STATEMENT, MARCH 1985

Gentlemen:

Following are our comments on the above referenced document as it pertains to our independent oil and gas company.

The document is a comparison of four alternatives of management for the Grand Junction Resource Area including: Continuation of Current Management Alternative (CCMA), Commodity Alternative (CA), Protection Alternative (ProA), and the Preferred Alternative (PA). Our comments will deal only with the PA since, as discussed in our meeting of July 11, 1985, this is the plan which culminates all three plans and is the likely one to be adopted considering all comments you receive. Further, we will address initially the overall plan in general and secondly Appendix C, "Standard Design Practices" and Appendix E, "Oil and Gas".

We do, however, reserve the right to comment on subsequent documents including the final Plan regardless which alternative is ultimately chosen.

STIPULATIONS (Appendix E, pp. 266)

39 General This document proposes stipulations be placed on new Federal Oil and Gas leases in order to protect Federal lands for multiple use. It is our understanding that stipulations, if any, will be an integral part of the lease. There are fifteen such stipulations identified in the Plan, any or all of which could be a part of any new oil and gas lease.

The independent operator actively engaged in exploration spends thousands of dollars per year on lease rentals, competitive lease bids and simultaneous leasing. If a prospective lessee must wade through the possible financial ramifications that will be due to stipulations in place on a Federal lease, he will be far less likely to pick it up. Further, these stipulations will differ lease by lease causing a different situation with which to deal at each prospect.

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39 We feel that stipulations should not be placed on or within oil and gas leases. Rather, protection of our natural resources should be governed through properly approved rules and regulations. We are currently, as responsible operators, able to read and interpret pertinent rules and regulations and apply them to our properties.

Specific. We propose that the stipulations be affected within rules and regulations of the BLM governing the development of Federal leases with the following specific comments.

1. No Surface Occupancy (NSO)

39 We feel this stipulation is unnecessary. If the BLM determines a portion of land must be designated as a NSO, that land should be withdrawn from a lease parcel and rentals/royalties will not be charged a lessee on those lands. The BLM still reserves the right to minimize occupancy on types of surface disturbance through its existing rules and regulations and the other proposed stipulations within the Plan.

51 We note that on page 35 of the Plan, Hunter/Garvey Canyons have 7600 acres designated NSO within them. There are either existing and/or proposed wells within these canyons which will need pipelines in the near future. Although the wells are grandfathered, the pipelines are not. A tremendous amount of money will have been wasted if gas, ready to sell, has no avenue of transport.

This is only one example and there are many others included on table 2-6 "Oil and Gas Leasing Restriction Recommendations.

38 Additionally, directional drilling, as discussed at our July 11 meeting, is unrealistic in most areas of the Grand Junction Resource district. Most of the producing formations are shallow in this district and therefore preclude directional drilling.

2. Scenic and Natural Values

We feel this stipulation is appropriate as written specifically noting the phrase "...may be required...". However, we note herein that from the rims of the Grand Mesa, the Colorado National Monument, Demaree Canyon, the Bookcliffs, etc., much of the current and/or prospective oil and gas properties are visible. We feel degradation should be avoided in all cases, but access roads, pads, pipelines, and drilling and pumping rigs are not degrading within a producing oil and gas region. Trash, oil spills, abandoned and unreclaimed drilling activities, off-road vehicle tracks, etc. do create a negative visual impact.

3. Steep Slope

40 This stipulation is unacceptable as written. Given that the Grand Junction Resource Area lies within mountainous terraine and canyonlands, the majority of lands are slopes greater than 40%. That lesser portion with slopes smaller than 40% would often be rendered useless due to the nature of roads and pipelines. A representative of the BLM pointed out at our meeting of July 11 that a recent computer printout of the Douglas Pass quadrangle showed 80% of that area had slopes greater than 40%. There could be no further drilling nor pipelines within that quadrangle.

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40 We recognize the necessity of protecting the integrity of steep slopes in certain circumstances and suggest that the phrase "...no...activities will be allowed..." be changed to "...surface activities on steep slopes will be reviewed by the BLM for the purpose of protecting against undue...".

We feel this "softer" language guarantees the rights of the BLM and the operator to determine the best plan together in a sensitive area with steep slopes.

52 4. Elk Calving Area
9. Bighorn Seasonal
10. Wild Horse Winter Range
11. Wild Horse Foaling Area
12. Deer and Elk Winter Range

We feel the above stipulations (4, 9, 10, 11 and 12) are appropriate as written with the exception that the wording "...will be allowed only..." should be changed to "...may be allowed only...". This wording still reserves the right of the BLM to impose such rule, but also allows the possibility of the operator, in special circumstances, to ask for a waiver from the BLM in writing if the rule is not pertinent during a given year, or if his proposed operations are determined not to create a hazard to wildlife.

5. Cultural Resources

39 We feel this stipulation is unnecessary. A known cultural resource should be withdrawn from a Federal lease and rentals/royalties not charged on such lands. If they are not to be fully protected as implied by the wording of the stipulation, then those lands should be retained in the lease. In this case, we feel they are already protected against degradation by virtue of rules and regulations already in place with the BLM.

6. Watershed
7. Perennial Streams

39 These stipulations are unnecessary by virtue of required approvals by the BLM already in place.

8. No Surface Disturbance (NSO) - Gunnison Gravels

38 We feel this stipulation is appropriate as written. However, any Federal leases which may include portions of this designated area should have those portions removed from the lease acreage and rentals/royalties not be charged.

13. Threatened and Endangered Plant Habitat
39 14. Threatened and Endangered Animal Habitat
15. Threatened and Endangered Seasonal Habitat

We feel the above stipulations (13, 14, 15) are unnecessary by virtue of required approvals by the BLM already in place.

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STANDARD DESIGN PRACTICES (Appendix C, pg. 245)

Referring to the third listed item under General where, under the PA and applied to WSA's, recontouring is required to match the original natural topography, we request this requirement be deleted.

49 We feel that recontouring should be done to accommodate maximum soil retention, provide for proper area drainage, and minimize visual impacts. This, in many cases, will not be accomplished by recontouring back to the original topography. Drainage can often be improved and slopes reduced, both of which will reduce soil loss. The color contrast which occurs with disturbance and revegetation will be eliminated through the process of natural revegetation and selection with time. Therefore, a disturbed area should be recontoured to accommodate the re-ention of a delicate seed bed for germination which will retain the soil and allow for natural revegetation and selection.

Referring to item six under General where, under the PA and applied to WSA's, bringing in topsoil is required, we request this requirement be deleted.

53 There are many alternatives when revegetation of an area is required to assist poor soil. Hauling in topsoil will prohibit oil and gas exploration and development activities in probably all cases due to its cost. Some alternatives include nitrogen fixing plants (seed), mulch, commercial fertilizers, and transplants. There are many more. Certainly, site specificity must be considered.

Again, appropriate revegetation is already controlled by rules and regulations in place by the BLM. Improper reclamation is currently fined. Further, reclamation bonds are required.

Referring to item three under Oil and Gas Drilling where, under the PA and applied to WSA's, removal of pit fluids is addressed, we request this requirement be changed.

49 "Reserve pit fluids...will be removed..." should be changed to read "Reserve pit fluids which contain hazardous wastes as defined by the Environmental Protection Agency will be removed..."

We feel there is no need to remove fluids which propose no danger to the environment and which will dry and be covered during the reclamation process.

SUMMARY

We in the oil and gas industry appreciate the difficulty with which you have been faced in trying to accommodate the needs of everyone when managing Federal lands.

Imposing restrictions on industry such that further development will not be economically possible is not problem solving. Hopefully consideration will be given the well being of an important segment of the Western Slope economy. Further negative impacts to the Oil & Gas industry can only adversely affect Federal, State and County governments getting benefits from royalties and taxes from this industry.

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We suggest that it is possible for all to be satisfied by working together and developing reasonable guidelines for the Multiple Use Concept.

We offer our support to you as a protective agency and present our comments respectfully.

Sincerely,

Pam Gerdeman

Pam Gerdeman for
Walter S. Fees, Jr.

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P.O. BOX 1941

Carl Burley & Associates, Inc.
— Oil, Gas and Minerals Exploration —
"Properties Management"
GRAND JUNCTION, COLORADO 81502

PHONE (303) 245-2726

July 16, 1985

Re: Grand Junction Resource Area
Draft Resource Management
Plan and Environmental Impact
Statement, March, 1985

Bureau of Land Management
Grand Junction District
764 Horizon Drive
Grand Junction, CO 81501

Gentlemen:

Carl Burley & Associates, Inc. was unable to be represented at the July 11, 1985, meeting to discuss the Grand Junction Resource Management Plan and Environmental Impact Statement. However, our office has reviewed the document and also had the opportunity to discuss proposed regulations with other local oil and gas operators, including Walter S. Fees, Jr.

Mr. Fees office has very adequately covered objections and comments regarding this subject in a letter to your office dated July 12, 1985, prepared by Pam Gerdeman. Rather than reiterate objections/suggestions expressed therein, we would like to communicate our concurrence with their opinions. A copy of subject letter is attached for your reference. We do, however, reserve the right to comment on subsequent documents including the final Plan regardless which alternative is ultimately chosen.

Unnecessary or overly restrictive lease stipulations should be avoided due to their administrative cost, or the cost of opportunity forgone: the development of federal leases and subsequent generation of royalty revenues for the federal government.

54 Standard design practices such as recontouring to the original topography, bringing in topsoil, required removal of pit fluids without regard to their danger to the environment, should not be mandated practices. These are requirements which would involve prohibitive cost for the oil and gas operator and are not necessarily prudent in every case.

We would like to suggest that the wording of any proposed regulation be such to allow latitude as to whether or not it is beneficial to implement the practices mentioned above.

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As you are aware, the energy industry is currently experiencing extreme economic difficulties, evidenced by the myriad of financially distressed properties. We feel that by simply avoiding undue costly regulation in these hard times, everyone will benefit, expecially the United States Government, through greater exploratory efforts as a result of the issuance of new leases, and royalties generated.

Our staff's interaction with BLM personnel has enabled us to empathize with the problems and difficulty of land management, especially when many interest groups are involved. Therefore, we feel that the attitude of cooperation must be adopted by all parties to arrive at reasonable guidelines.

We hope to continue our mutually beneficial relationship with your organization and respectfully submit the comments contained herein.

Yours very truly,

Carl L. Burley
Representing American Resources
Management Corporation, Operations
Manager and Carl Burley &
Associates, Inc.

LLD:pl

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MID-AMERICA PIPELINE COMPANY

July 16, 1985

Forest Littrell
Bureau of Land Management
Grand Junction Resource Area
764 Horizon Drive
Grand Junction, CO 81506

Dear Mr. Littrell,

Thank you for the opportunity to participate in your meeting of July 11, 1985 concerning the proposed Grand Junction Resource Area Management Plan (RMP). Based on the RMP meeting and a review of the draft RMP, Mid-America Pipeline Co. supports the preferred alternative. However, the following comments need to be made:

42 1. Paragraph 5-A, page 239, requires "All material 4 inches in diameter and greater will be removed from federal land unless otherwise directed." From the standpoint of pipeline construction this could be an expensive restriction, additionally the public could be served better if it was made available for public use as firewood by leaving it on the pipeline right-of-way. Furthermore, if your intentions are to closely approximate the natural processes, scattering the cut material would be in order.

55 2. Paragraph 12, page 240, specifying method and time of seeding. In as much as this requirement does not relieve the grantee from the responsibility of restoring ground vegetation this requirement should be a recommendation.

56 3. Paragraph 3, Pipeline Standard Design Practices, page 242. Requiring pipelines to be constructed parallel to existing roads. Pipeline locations should not necessarily be tied to existing roads because of the nature of pipelines, i.e. while it is possible to build pipelines up steep inclines and over passes, it is not possible to do the same with roads. The additional cost, environmental damage and risk would prohibit construction of pipelines along a road which switches back and forth up a steep slope. Furthermore, where conditions permit, existing roads would be utilized for construction purposes because of economic reasons. We recommend omitting this paragraph.

54 4. Paragraph 1, page 245, requiring separation of top soil. This paragraph insufficiently defines the construction area. Stripping an entire pipeline easement is very disruptive. Common practice in the pipeline industry is to separate only the top soil over the ditch as directed.

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MID-AMERICA PIPELINE COMPANY

53 5. Paragraph 6, page 245, Requiring 6 inches of top soil to be hauled into areas where revegetation is not satisfactory. Upgrading natural soil or vegetation conditions should not be a purpose of pipeline construction. This paragraph is too restrictive to the pipeline industry. Furthermore, this requirement may extend beyond the scope of Federal Regulations governing the use of public lands.

40 6. Paragraph 11, page 245, precludes construction on slopes in excess of 40%. Construction operations would normally preclude construction on slopes in excess of 40% because of economic and risk reasons. However, conditions sometimes require construction on these slopes. An avenue of appeal should be provided which could eliminate the need for costly litigation caused by an arbitrary or unjustifiable ruling by the district manager.

301 7. Table 2-21, Public Utility Corridor Recommendations, page 63, the corridor specified along MAPCO's pipeline in the West Salt Creek area should be extended along the pipeline to the northern boundary of the Resource Management Area. The corridor width and location should be defined relative to the existing utilities.

In many areas of restrictions and stipulations in the RMP the final approval is left up to the District Manager and whereas the present administration is reasonable with regards to cooperation, other administations may not be as reasonable; an avenue of appeal should be clearly outlined to preclude unnecessary and costly litigaton.

Thank you for your time and consideration.

Sincerely,

Douglas M. Lee

DML:lcu

File: Loc. Code 05-05-09-12
cc: James N. Lieber
Ray Pendersan
Fred Isaacs
E. E. Hissey
Doug Lee
D. G. Prescott

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July 15, 1986

Mr. Frosty Littrell, Area Manager
Grand Junction Resource Area
Bureau of Land Management
764 Horizon Drive
Grand Junction, Colorado 81506

Dear Earthling:

Please accept my comments on the Grand Junction Resource Area Resource Management Plan and Environmental Impact Statement (RMP/EIS). I apologize for the delay in relaying these comments to you. If the truth be known, I was caught in a time warp. I arrived in Grand Junction in the 21st century rather than your present time. I might mention some of the scenes I witnessed during that time period so that you will understand the basis of some of my comments. But first, allow me to introduce myself.

My name, in a language comprehensible to you, is Dr.X. I am from the planet Zebulon and am fulfilling a "goodwill mission". Some of your staff will already be familiar with me since I also commented on the Glenwood Springs Resource Area RMP/EIS. The planet Zebulon has been stripped of its natural resources. We now rely upon artificial resources entirely. My mission to earth is to impress upon its inhabitants to use its natural resources wisely, thereby ensuring that these resources will not be depleted so that the quality of life will remain intact.

After reviewing your document and comparing it to other similar BLM documents, it is apparent that your RMP/EIS is quite superior. However, there are several miscalculations in judgement contained in this RMP/EIS. In several instances, your decisions favor economic developments over preservation of natural resources. We, on the planet Zebulon, proceeded in such a manner ourselves. Zebulon is now void of pristine open areas in which its inhabitants may wander and utilize for scientific, mental and physical restorative, and recreational purposes. One particular case where you have favored economic development over pristine open spaces is in the Bookcliffs. You have recommended that Little Bookcliffs Wilderness Study Area and Demaree Canyon Wilderness Study Area both not be designated as wilderness. I suppose this is a good time to mention that when I popped into the 21st century, the Bookcliffs had been obliterated completely. All that existed between I-70 north to Craig was a stretch that resembled the back side of the planet Xernon--and we both understand the terrible implications of that!!

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Page two

I would recommend to your staff that all seven Wilderness Study Areas (WSAs) are deserving of designation as wilderness with a capital W. You have already discarded some prime wildlands during your intensive inventory, and therefore, should not be the least bit intimidated to recognize the wilderness characteristics of these last remaining seven WSAs and recommend their inclusion into the National Wilderness Preservation System. The future of this area rests in your hands. You can change the scenario I witnessed in the 21st century.

Now for a paragraph or so on the issue of water. Zebulon relies on a chemical substance to hydrate ourselves since we no longer have water resources available on our planet. In retrospect, we see that we did not protect our free flowing rivers adequately, nor did we conserve our precious water resources. I would urge you to do all you can in your power to preserve and protect those water ways under your jurisdiction. I liked your recommendation to withdraw the Colorado River corridor in Ruby and Horsethief canyons from mineral development. I would hope that similar suggestions would follow for other rivers studied for Wild and Scenic River status, e.g. the Dolores River below bedrock (and what about the Gunnison? Will you protect it, too?).

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It was apparent to me that you and your agency recognizes the importance of recreation to the human body and soul. Your recommendations for special recreation management areas were most welcome. In fact, when I visit this area, there are several recreation spots that I frequent. I must say, this is the most scenic region - and certainly the most fun area to frolic in - in the entire state of Colorado!

My time is growing short for this relay communication. I am bound for the planet Htrae--they are in an opposite galaxy to yours, but interestingly enough, are committing the same resource exploitation errors as your planet. Thank you for this opportunity to comment on your document and thus fulfill one of the goals of my goodwill mission. I eagerly await your final RMP/EIS and wilderness recommendations to your congress.

Universally submitted,

Dr. X, Ambassador
Planet Zebulon

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THIS LETTER HAS BEEN REPRODUCED

Bureau of Land Management
Atten: Forest Littrell

July 15, 1986

To whom it may concern,

I am Micah Yates, the nephew of Bill Rambo who owns the ranch in the Little Dominguez Canyon. I have a very strong interest for that very special area and am concerned about how the BLM may choose to designate it.

For nearly forty years I have explored the Big and Little Dominguez canyons, climed cliffs, observed the delicate spring areas, protected and matured wildlife and in general helped to maintain the important eco-system.

An incident occured when I was in my teens which had a permanent effect on my awareness.

Upon returning from a climbing outing with my family, I was decending down the slope and found myself on a formation that the locals call "red belt." Once the belt started to move I was caught in the flow which was carrying me to the edge of a sixty foot drop. My mother understood what was happening and with her insight and guidance I was able to avert a serious accident.

Since that time I have been able to perceive every possible safety for myself and others. And just as important, understand how not to disturb the very fragile eco-system of rocks, soil, plants and animal life.

In my observations of other areas which have become wilderness designated and where there is a tremendous influx of people, I have seen literally thousands of examples of destruction, increased errosion and a fouling of natural springs and waterways.

For years in the Dominguez Canyon I have packed out cans, trash and picked up broken bottles which have been thrown or shot at.

It saddens me to realize that such a designation in the Dominguez Canyon would surly turn this remote and beautiful life system into one more of mankinds dumping areas, with toilet paper and trash behind every other bush. Trails and dislodged and thrown rocks will errode the slopes, petroglyphs will be defaced and destroyed forever and the sweet precious water will no longer be safe to drink.

Please leave this area to be found and explored by those who take time to pack into remote areas, rather than a special designation which will advertise for hundreds of thousands who have no knowledge or appreciation of the delicate balance of life.

I strongly favor No Action in the Dominguez Canyon area.

Sincerely,

/s/ Micah Yates

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ROCKY MOUNTAIN NATURAL GAS COMPANY, INC.
P.O. BOX 700, GLENWOOD SPRINGS, COLORADO 81602 • PHONE (303) 945-6017

July 17, 1985

Bureau of Land Management
Forest Littrell, Area Manager
764 Horizon Drive
Grand Junction, CO 81501

RE: Comments relative to your Draft Grand Junction Resource Management Plan and Environmental Impact Statement (RMP/EIS).

Dear Mr. Littrell:

In all honesty our choice of your RMP Alternatives would be the "Continuation of Current Management Alternative" (CCMA). Why? Because it works, albeit awkwardly at times and too slowly at other times. The CCMA is familiar territory, something we as a pipeline company and well operator can depend on. Current Management provides practical and sufficient environmental protection while allowing prudent extraction of our vital natural resources.

54 The proposed "Standard Design Practices" (SDPs), Appendix C as well as the "Oil and Gas Lease Stipulations" seem to reflect some staff members hidden agenda for the Resource Area. Your office has always been able to administratively react to environment protection needs in a balanced, reasonable, and timely manner. From my general review over the years of Western Colorado Media output I have seen no major movement demanding that BLM reform their Practices and Stipulations as they apply to oil and gas development. For an industry already burdened by "Standard Design Practices" dictated from many quarters (examples: D.O.T., P.U.C., EPA, OSHA, etc.), one more set of SDPs can only depress an already depressed but strategic part of our GNP.

I will briefly touch on some of the more extreme parts of your proposed SDPs and Stipulations:

42 1. Page 239, item 5. Under tree disposal you would require "all material 4"...and greater will be removed from federal land...Firewood collectors will accomplish this without our help but should they not what harm does this material cause the public's land by remaining on it? The eventual decomposition of this material cannot help but build up what is in most cases poor soil. This material can in large part be scattered, to in extent rendering it harmless visually and environmentally.

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Bureau of Land Management
Forest Littrell, Area Manager
July 17, 1985
Page 2

43 2. Page 240, item 15. Compaction for culverts seems burdensome in light of the types of location roads common to operations in Western Colorado. If a fill section at the drainage does not require compaction but the culvert does, will this not in effect direct water into the softer fill causing it to fail and leave the culvert high and dry? I have observed just such an occurance on more than one occasion. I have covered your part of Western Colorado for nearly 13 years now and can see no real evidence proving the need for more stringent SDPs.

56 3. Page 241, item 2/3. This supports your movement toward locating pipelines in roads. Strong, verifiable experience now suggests that roads are not always a wise and prudent place to locate pipelines. I would suggest that roads offer only one of several reasonable alternatives available for review at the on-site stage of any application. Please do not tie your kite too strongly to roads.

53 4. Page 245, Table C-1. Importing topsoil is a landscaper's dream, not the real world of Western Colorado. Next we will be seeing sprinkler systems required. While all this may apply to a Colony Project, a Union Oil Shale Complex or the Ca and Cb tracts it is not reasonable to expect an operator to haul 6" of topsoil to a dry hole location 20 miles up in the Bookcliffs. Some of our pipeline system crosses land that supported no vegetation day one. It strikes me as artificial in the extreme to require imported topsoil merely to please the eye or retard erosion which has gone on long before this area was settled.

56 Pipelines. Again the installation of pipelines in access routes comes up. While you show that applying only in the Pro A category, the statement that "No cross country installation will be permitted" is shocking to the system.

57 5. Page 247, Table C-1 cont'd. Why not allow a variance to provide for a buried dry hole marker in Pro A and PA categories? BLM maintains a case file record showing the survey coordinates of the well. A surveyor could re-establish the location within a few feet and a metal locator would do the rest. The flush mounted plate seems to offer more hazard than help.

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Bureau of Land Management
Forest Littrell, Area Manager
July 17, 1985
Page 3

40 6. Page 267, item 3. Please do not use an arbitrary 40 percent slope development cutoff in any kind of final draft. While I understand the intent behind it I also recognize from considerable field experience throughout Western Colorado that it will place a major damper on Western Colorado energy development. The "easy" wells have already been drilled in many of your Area's more promising prospects. By easy I mean wells that have been located along existing transportation cooridors, valleys, mesas and drainages. The remaining acreage, the in-between acreage is no less valuable to the lessee and the people of this country yet under the 40% strip, much of it will be unaccessable and the remainder will be found only by exotic and costly methods, in many cases not cost effective.

Summary

The United States presently enjoys the benefits of a natural gas "bubble" and a crude oil glut while blissfully unaware that they are on a downhill slide toward another energy crunch. Development pressures on the public domain have eased off but this is only temporary. For various reasons and in accordance with many emerging indicators this country will once again call on the energy industry and the public domain to bail it out. While the boom/bust cycle is unfortunate it never-the-less continues to be an economic fact of life under our system. This is not a time to relax and restrict. The more we learn about the Piceance Basin, tight sands and all, the more we discover what an energy store house it really is.

I often have difficulty with the Federal SMA's head long rush to generate all these vast, complicated and no doubt very expensive plans. I suppose congress has dictated that this flurry of work and effort take place. Did they require a measurement and rating of the results?

In my opinion the Grand Junction BLM District has on a whole conducted their management responsibilities very well over the years. Our Company has for the most part been treated fairly and with respect. Why then this drive toward sweeping changes in the way you do business with us? You have always had an excellent grasp of what your area is made up of, the many resources, uses, unique areas and qualities that abound. There have been few if any real charges brought against you for mis-management or neglect of the public trust. All this brings me back to my opening position, that of favoring the CCMA.

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Bureau of Land Management
Forest Littrell, Area Manager
July 17, 1985
Page 4

Thank you for this comment opportunity.

Very truly yours,

Larry M. Matson
Engineering/R.O.W.

LMM/tll

PC: Allen L. Rhodes, Sr. Vice President

BURKHALTER ENGINEERING, INC.
715 Horizon Drive, Suite 330
Grand Junction, CO 81501
Telephone (303) 243-8555

Petroleum and Energy Consultants
Registered in Rocky Mountain States

82

July 15, 1985

Bureau of Land Management
P.O. Box 3768
Grand Junction, Colo. 81502

Re: Comments Concerning Grand Junction Resource Management Plan and Environmental Impact Statement

Gentlemen:

You have asked for comments concerning your proposed plan and rules on the above referenced matter. My comments follow:

Wilderness

Wilderness is actually the poorest stewardship of the land which we can think of. It precludes use of the land by any but less than 1% of the population who seem to have the time to spend fooling around there.

I am very gratified to learn that you have deemed the Demaree Canyon, Little Bookcliffs and Palisade areas as nonsuitable for wilderness. As far as I am concerned, no area is suitable for wilderness designation as we know it today. I, personally, have found better hunting, better fishing and better camping in areas which [illegible] for timbering, mining and drilling.

58 **No Surface Occupancy (NSO)**

If a lease is not strategically laid out so that it can still be used to accommodate the NSO designation within its boundaries, the lease is completely useless. Therefore, I would strongly recommend that lease boundaries be set by local offices which are familiar with the terrain, the NSO designations and requirements for utilization of the lease.

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July 15, 1985

BLM
Page 2

Abandonment Marker

59 Whatever you do about abandonment markers please do not erect a steel plate two feet by two feet one foot above the ground. A device such as this will be very destructive to livestock. If certain "tree huggers" are offended by the abandonment markers as they exist today, then no marker or a plate flush with the ground would be suitable.

Steep Slopes

40 Your proposed edict on steep slopes is totally unacceptable. To state unequivocally that "no surface disturbing activity will be allowed on slopes greater than 40%" is capricious and arbitrary. This language should be softened to indicate that stipulations will be written site specific for each and every location. Some slopes over 40% are perfectly stable for roads and/or locations. Others at 20% are unstable. Language for slopes should be designed so that area surface management personnel must be site specific for each application.

Air Drilling

60 Injection of water to minimize dust is fine in the summer months, but during cold weather this may cause the blooie line to ice up causing tremendous problems. If the blooie line should ice up and plug off just as a big gas sand is drilled into, a disastrous fire could result destroying both lives and property.

Additionally, the blooie pit does not necessarily have to be located in "50% cut". Particularly, the blooie line needs to have a good bank to discharge against so as to assure effluents from the drilling are contained within the pit.

Top Soil

53 The proposed rule to haul in top soil to spread over a location is asinine. We are not doing rehabilitation work to improve the country, we are merely trying to restore it as it was before. Importing top soil into an area where there is none is probably one of the more ridiculous requirements I have heard of.

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July 15, 1985

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Sewage

47 We have been using bore holes for sewage disposal for many years at drilling locations. At no time do we have evidence of "ground water being polluted" or "public safety being jeopardized". Particularly in Western Colorado - Eastern Utah there is no suitable ground water in 99.9% of the drilling locations. There is, therefore, no ground water to pollute. These "sanitary holes" have worked very satisfactorily throughout the years, and I see absolutely no reason for stopping them now.

Pipelines

61 Again, pipelines should be site specific. If construction is cheaper and better along the roads, indeed the pipelines should be laid along the road. Some terrain and situations would necessitate putting the pipeline cross country. In these situations laying the pipeline in the road would be asinine. In certain areas laying the pipeline in the road would actually be totally unsafe due to grading requirements.

Drilling Fluids

54 To simple say that waste drilling fluids and cuttings will be contained and removed from the site to an approved disposal facility is too broad. Most drilling locations in the desert areas where we work are perfectly suitable for disposal of cuttings and drilling fluids. This should be reworded to say that those areas which are environmentally sensitive should be reviewed for removal of cuttings and drilling fluids - not the entire industry.

Also, some reserve pits can be left fenced to dry for a year or more with no harmful effects to wildlife, livestock, people or the environment.

54 **Geophysical**

Again, to say that "no blading or other dirt work would be allowed" is too broad. These issues should be addressed based on the site in which work is proposed.

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July 15, 1985

BLM
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Overall, the proposed language in the Preferred Alternative is too restrictive. All the "wills", "shalls" should be modified and softened so that discretion may be used by area personnel on the ground and at the site. I am sure your intent is not to completely preclude oil and gas exploration, but strict interpretation of the Preferred cAlternative as it is written would lead directly to the end of oil and gas production in the Grand Junction resource area.

Thank you for this opportunity to comment on the proposed BLM rules.

Very truly yours,

J. N. Burkhalter

J. N. Burkhalter, PE/PLS

JNB/hm
cc. Walter Fees, III

83

NORTHWEST PIPELINE CORPORATION
ONE OF THE WILLIAMS COMPANIES

82 FORESIGHT CIRCLE
GRAND JUNCTION, COLORADO 81505
(303) 245-3600

July 16, 1985

Bureau of Land Management
Grand Junction District
ATTN: Forest Littrell, Area Manager
764 Horizon Drive
Grand Junction, CO 81501

Dear Forest:

This letter is to comment on the March, 1985 draft of the Resource Management Plan. The major concerns we have are as follows:

A) We understand your resource area has a pilot program dealing with paleontological resources. Your draft sets aside 433,760 acres classified as Class I, needing either a survey or no surface disturbance at all. We feel the acreage involved classified in Class I to be very prohibitive. We understand the few major sites we have in this area need to be protected and oil and gas production/exploration can work around these few areas. Having to get a paleologic survey in approximately one-third of your resource area will be costly and time consuming in the granting process. We also see the paleology getting out of hand like archeology has, forcing industry to hire indepesdent paleologists to clear routes. 73

Now that we have cost reimbursement we view this as a way to get more field exams and more money from industry.

We also view this proposed Class I classification of over 433,000 acres as an attempt to justify jobs within the BLM.

B) The next comment we wish to make is concerning Wilderness Study Areas. 62

If BLM allows producers to drill in Wilderness Study Areas under the pre-FLPMA leases, BLM should at that time consider pipelines to produce these wells.

We have, in the past, applied for grants in a WSA where wells are drilled and completed but BLM refused to grant pipeline rights of way.

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Bureau of Land Management
July 16, 1985
Page 2

It seems foolish to allow a well to be drilled that cannot be produced.

C) The next comment is dealing with the 40 percent grade stipulation. If you enforce this stipulation we may as well close all the Bookcliffs to oil and gas exploration and production. The 40 percent delineation is very prohibitive. We would like to see this changed to 60 percent. 40

Please consider our concerns when drafting your final management plan. The more costs involved in obtaining rights of way from governmental agencies, the more the consumer pays for oil and gas.

Respectfully,

NORTHWEST PIPELINE CORPORATION

John R. Clark

John R. Clark
Right of Way Agent

:hd:360:7300.0

84

#7 Chardonnay Ct.
Grand Junction, CO 81503
16 July 1985

Forest Littrell, Area Manager
The Bureau of Land Management
Grand Junction Resource Area
764 Horizon Drive
Grand Junct'on, Colorado 81506

Dear Frosty:

Following are my comments regarding the Grand Junction Resource Area's DRAFT Resource Management Plan and Environmental Impact Statement (March '85).

1. In general, the document is well-written and well-researched--considerably better than some of the other Resource Area plans that have been released for western Colorado. There has obviously been a real effort to achieve a degree of equity in the use (and non-use!) of this area's resources; the pro-development bias which so often pervades such documents has been tempered by an uncommon sensitivity to the large segment of the public that values other uses of its lands. Wonderful!

2. Cultural resources--

a) Under the Preferred Alternative (PA), eight "high value" sites would be "actively managed," while 154 other "high value" sites and 141 moderate value sites would not be actively managed. How were these eight sites decided upon, i.e. what were the criteria used? Also, what exactly does "active management" imply? If it means improving access to significant sites such as Indian Creek and Sieber Canyon, I am opposed. 166

On p. 212, it is stated that "No protective measures would be taken to reduce the effects of natural deterioration or vandalism" (with regard to all but the eight sites to be actively managed. Isn't this policy in violation of Executive Order 11593 which instructs all federal agencies to provide national leadership in historic preservation and to assure the preservation of cultural properties in federal ownership? Isn't it also a contradiction of the Archaeological Resources Protection Act of 1979, Sec. 2b., "The purposed of this Act is to secure, for the present and future benefit of the American people, the preservation of archaeological resources on all lands owned or controlled by the United States?" 171

b) The Indian Creek site is slated for "active management" but is not granted special status (ACEC, RNA, etc.) under the PA. I suggest 166

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that this area be designated an archaeological district and afforded whatever protection possible (e.g. reduction of access, periodic monitoring/patrol, etc.). Archaeological materials have been found the entire length of the drainage, from just north of Cheney Reservoir in the vicinity of the powerline crossing to the spring area at the creek's head; the acreage should be revised to reflect a corridor roughly seven miles long and one-half mile wide (the eastern extent lies on Forest Service lands)--2240 acres. The plethora of artifacts (including some Paleo-Indian finds) within the Indian Creek drainage and the likelihood of it contributing significantly to the prehistoric record demand its protection beyond mere "active management." 166

c) The Sieber Canyon area is likewise suggested for active management. Archaeological materials and rock art within this canyon represent a unique manifestation of the Classis Period Fremont. At least ten sites eligible to the National Register are present; a stratified site at the mouth produced cultural deposits to a depth of 3-4 meters. I suggest that the Sieber Canyon area be designated an archaeological district measuring approximately three miles long (the length of the canyon) and one-half mile wide. In addition, the head of the canyon (spring area) should be acquired by the BLM. 172

d) The no surface occupancy designation for high value areas does not adequately protect significant resources from vandalism; this should not be substituted for elimination of access in archaeologically sensitive areas. 165

3. Utility corridors--

The draft states that, under the PA, the use of existing corridors will be "encouraged." Why can't this be mandated, rather than merely encouraged? 302

4. Wilderness--

The BLM's recommendation of Black Ridge/Black Ridge West, Dominguez, and Sewemup Mesa as wilderness is great (also the semiprimitive, non-motorized recreation emphasis in Granite Creek, Hunter/Garvey Canyons, and Bangs/Rough Canyons). However, I support wilderness recommendations for the Palisade and Little Book Cliffs as well. Only a small portion of the Palisade is affected by ORV use; perhaps modification of the boundary in just this area should be considered, rather than eliminating the entire area as potential wilderness. Certainly the other values of the Palisade (opportunities for solitude, unique ecosystem, scenery) justify its designation as wilderness. The Little Book Cliffs is deserving of wilderness designation simply by virtue of being the last remnant of roadlessness in the Book Cliffs! The scenery and opportunities for solitude are spectacular--and all within a half-hour of town. The limited-to-existing-roads designation on the 9000 acres outside the wild horse range would indeed "help to minimize impacts on naturalness" were it adhered to; however, in view of your own qualifier "provided this can be enforced," I am skeptical and would much prefer a wilderness designation for the Little Book Cliffs WSA (which, by the way, comprises less than three percent of the entire Book Cliffs area--all open to oil and gas development). 238 204

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5. Paleontology--

74 As with the Fruita and Rabbit Valley Sites, the Hell's Half Acre locality (along the DeBeque Cutoff) should be designated a RNA. Vertebrate fossils, including mammalian fauna, have been collected here since 1933, and the area is considered to be of scientific significance by local paleontologists.

Thank you for your consideration of my comments. I will look forward to the release of the final RMP in November.

Sincerely,

Danni L. Langdon

Danni L. Langdon

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THIS LETTER HAS BEEN REPRODUCED

7-12-85
DeBeque Co.

Forest Littrell, Area Mgr.
Bureau of Land Mgmt
Grand Junction Res Area
764 Horizon Drive
Grand Junction, Co. 81506

RE: Albertson RMP Comment

Dear Mr. Littrell:

I'm not aware if the comment period has been extended on the Gd. Jct. RMP or not, but if you can still use them, here are a few ideas that might help in your preparation of the final.

Preferred Alt - Area Co-1 page 100

Transportation:

298 I oppose the plan to open up access into any of the areas you propose but I especially object to those in Hopple Gulch and Tater Hills. The Tater Hills access would cross my land. I have always worked with your people in giving them access across my land for any reason they gave me - when they had the big burn project back there, I signed a 1 year access easement to let them in. You state the reason for access to this area is forest mgmt, you've never been denied access for that purpose, so why the need for public access unless you have other pressure from other users that you fail to identify.

293 The Middle Dry Fork, Cow Ridge and Horse Mountain proposed access is either crossing private property or is on BLM lands that are under unpatented oil shale mining claims. These claims have had several favorable court decisions for the applicants in recent monthes - what a waste of taxpayers money to acquire ROW's and build roads only to have it all put into private ownership by the claimants going to patent with their claims. I don't think you can rightfully justify considering access across any lands that are considered for patent as these lands are.

85

293 I personally feel that hunting access is the primary force behind all your attempts to acquire access into these areas. All these areas are presently being hunted with probably what is close to a very optimum hunting pressure. To open up general hunting in any area that is intermingled between private and public lands would create an impossible situation to control for local landowners.

I think under the present cooperation and working relationship that exists it would be counter-productive to initiate any proposal that would cause a distruption of these agreements.

Sincerely,

/s/ Dale B. Albertson
5466 202 Rd
DeBeque Co 81630

86

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION VIII
ONE DENVER PLACE — 999 18TH STREET — SUITE 1300
DENVER, COLORADO 80202-2413

JUL 17 1985

Ref: 8PM-EA

Forest Littrell, Area Manager
Bureau of Land Management
Grand Junction Resource Area
764 Horizon Drive
Grand Junction, Colorado 81506

Dear Mr. Littrell:

In accordance with our responsibilities under the National Environmental Policy Act and Section 309 of the Clean Air Act, the Region VIII Office of the Environmental Protection Agency (EPA) has reviewed the Grand Junction Resource Area, Resource Management Plan/Environmental Impact Statement (RMP/EIS). We appreciate the difficulty of addressing the resource conditions, management plans and associated environmental impacts for such a diverse area. Our primary concerns are related to water quality, air quality and wildlife considerations in activity planning for various uses of the Grand Junction Resource Area (GJRA) lands.

17 The diversity of resources in the GJRA will require additional site-specific project, activity plans and impact analysis based on this Resource Management Plan. In order to provide more specific guidance for these additional planning efforts, the Final RMP/EIS should emphasize: clarification of non-point source water quality impacts and controls, with emphasis on salinity mitigation measures; integration of watershed activity planning with various land uses; the enforcement of ORV restrictions; definitive riparian/wetland ecosystem protection policies; and discussion of monitoring in more detail.

306 Since many of the potential uses of the GJRA are expected to be concentrated and area specific, the Final RMP/EIS should also stress understanding by the public and users of the need for the proposed management actions. We believe there will be a continuing need for public, State and Federal Agency involvement in planning many of these actions. The process and opportunity for this education and coordination need clarification.

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Based on our review we have rated this RMP/EIS as EC-2. This means that EPA review has identified environmental impacts that should be avoided to fully protect the environment. In some cases, additional information will help to alleviate these concerns. Corrective measures may require modification of the Preferred Alternative or mitigation measures to reduce environmental impact. EPA is available to work with the GJRA to reduce these impacts. For further EPA assistance, contact Mike Hamner of my staff at (303) 293-1716 or FTS 564-1716.

Sincerely,

Dale Vodehnal

Dale Vodehnal, Chief
Environmental Assessment Branch

cc: Cannon Richards, Colorado BLM State Director
William Dickerson, A-104 (OFA)

86

EPA COMMENTS ON GRAND JUNCTION RESOURCE AREA
RESOURCE MANAGEMENT PLAN/ENVIRONMENTAL IMPACT STATEMENT (RMP/EIS)

307 The GJRA is to be commended for the extensive management activities proposed for the resource area. Due to the anticipated competition for funds and manpower the Final RMP/EIS should discuss funding sources and priorities for activity planning. The RMP should identify activities as high, medium or low priority to assist the public in understanding the GJRA's activity implementation strategy.

Water Quality, Soils Management, and Water Resource

18 The RMP/EIS devotes a great deal of discussion related to existing and potential water quality impacts. It is well recognized that the major impacts to surface water quality are increased sedimentation and salinity concentrations in the Colorado River. Table 2.2 Water Resources Management Recommendations on page 27 and the discussion on pages 27 and 28 list 13 areas "where critical erosion of saline and non-saline soils is presently occurring." However, the Preferred Alternative recommends activity planning and associated control measures for only 11 of these areas. We are unable to find justification for the elimination of these two priority areas, totalling some seven thousand acres, from the Preferred Alternative.

10 Since most of the soils and attendant ecosystem of the Grand Junction Resource Area are fragile, highly subject to erosion, and difficult to revegetate, we recommend implementation of Best Management Practices (BMPs) as established by the BLM National Non-point Strategy. Prior to the recommendation of a potentially more destructive activity for the land a monitoring program of range and soil conditions and impact trends should be established. This monitoring information, when applied to project design to minimize water quality degradation, should be entered into STORET.

11 EPA notes that the 18,000 acre Baxter/Douglas Pass soil slump area would be subject to no surface occupancy (NSO) under the Preferred Alternative oil and gas leasing restriction recommendations. We also note that this same 18,000 acre soil slump area is included as acceptable for further coal leasing consideration under the Preferred Alternative coal management recommendations. Should the Baxter/Douglas Pass soil slump area be considered suitable for further consideration for coal leasing, extensive lease stipulations will be required to preclude accelerated soil loss.

12 As discussed in the RMP/EIS a major traceable cause of soil disturbance is from off road vehicles (ORV) activity. The desert ecosystem found in the Grand Valley may be "exceptionally suitable" (page 133) for ORV activity yet the ecosystem is not capable of rapid natural recovery when exposed to extensive use.

86

12 We commend the level of proposed ORV management actions under the Preferred Alternative discussed in the RMP/EIS. However, we do have a concern that the proposed management action of concentrating "competitive and intensive off-road vehicle use on 10,240 acres of desert land between 27 1/2 Road and the west flank of Mount Garfield (including the face of the Book Cliffs)" could result in much higher rates of soil erosion. What control measures are proposed for this intensive use area?

Proposed management actions of appropriate watershed treatments would reduce soil erosion and salinity impacts. We recommend the GJRA work closely with adjacent land management agencies, private landowners, and lessees to extend appropriate watershed treatment activities to additional private and public lands.

Air Quality

7 We agree that limiting ORV use through closures and restrictions could decrease soil erosion and fugitive dust emissions. What effect will the proposed concentration of ORV activity in the 27 1/2 Road to Mount Garfield area have on the Mesa County designated TSP non-attainment area?

Wilderness

239 EPA understands that the draft RMP/EIS is to serve as a draft EIS for the final wilderness environmental impact statement. Will the wilderness study report to be prepared following the resource management plan completion be available for review before the Final EIS is published?

Wildlife

107 The RMP/EIS provides extensive discussion of the proposed management actions on big game habitat. It also addresses the potential impacts of various actions in wetlands and development in the 100-year flood plain. Due to the natural aridity of much of the GJRA, wetlands and riparian areas take on additional importance. This is especially true for non-game species. What types of coordination and joint activities/actions does the GJRA propose with the U.S. Fish and Wildlife Service and the Colorado Department of Wildlife to protect and enhance existing riparian areas?

19 We applaud the proposed development of new wetland areas. We suggest you consider the inclusion of wildlife cover areas when developing saline seep areas for sediment control.

108 We would like to see some discussion of the anticipated problems related to protection of riparian areas on perennial streams and sensitive wetlands. Will sufficient manpower/funds be available to provide monitoring and/or rehabilitation actions.

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109 The RMP/EIS refers to stream habitat improvement and stream bank stabilization proposed actions. We were unable to find the particular stream segments targeted for these activities. We assume an activity planning document will define these areas.

Grazing

158 EPA understands that proposed management actions for livestock grazing are covered in the Grand Junction Grazing Environmental Statement. A discussion of the impacts of these management actions as related to the Preferred Alternative Impacts should be included in the RMP/EIS, especially as they relate to cumulative impacts on the various management activities.

Monitoring

EPA believes the RMP/EIS development process can be used by the GJRA, because of public, inter-agency and inter-governmental involvement, to define roles and responsibilities for comprehensive monitoring plans for soils, vegetation, watershed, and ultimately, water quality resources. Appendix B lists possible management practices and Appendix C examines standard Design Practices. Coal and Oil and Gas leasing stipulations are covered in Appendix D and E respectively. While these appendices do discuss monitoring, we have additional concerns which should be addressed:

20
- Discuss water quality monitoring intensity needed to evaluate adequacy of best management practices for controlling non-point source pollutants.
- Identify required chemical and biological monitoring, for each proposed activity.
- Establish water quality monitoring responsibilities of the BLM, mineral lease holders and local, State and Federal agencies.
- Discuss corrective actions that could be taken in various situations which could arise (other than amending or revising the RMP) when problems are identified during monitoring.
- Emphasize the coordination and need for approval of the monitoring and remedial action plans by other relevant agencies, including State water quality, Soil Conservation Service and wildlife agencies.

87

Fuelco

Fuel Resources Development Co.
Diplomat Bldg. Annex
1780 14th Street
Denver, CO 80202-2108
(303) 534-1212

July 16, 1985

Mr. Forest Littrell
Bureau of Land Management
Grand Junction Resource Area
764 Horizon Drive
Grand Junction, CO 81506

Re: Comments on Grand Junction Resource Management Plan

Dear Sir:

Standard design practices applicable under all alternatives.

General

63 1. Maintenance? 24-hour notice, please explain why BLM needs to police maintenance activities. Define maintenance activities. Does this mean every time we blade a road we have to notify BLM?

42 5. In the past all trees/wood piles were completely picked up by locals or rig hands (to be used for firewood). Cutting and stacking 4" and larger material in 4' lengths accomplishes prevention of waste of resource.

64 9. Filling of erosional drainage areas with slash and/or stumps retards erosion and prevents soil loss.

65 15. A BLM engineering representative will conduct the compaction testing? Not once in the past 12 years have we had BLM save us any money. Why can't company engineers conduct compaction tests?

Pipeline Standard Design Practices

61 Operators are having problems with pipelines following access roads. Maintenance on roads due to pipelines is a real hazard.

The BLM needs to approve a wider road and have the pipeline companies bury lines a minimum of 42" when following an access road.

87

Mr. Forest Littrell
July 16, 1985
Page 2

Pipeline Standard Design Practices (continued)

61 Where pipelines are installed in oil and gas access roads, pipeline company shall be equally responsible for maintenance of said road.

Section 2-Oil & Gas Lease Stipulations

66 2. When drilling pad size is restricted to 200' x 200', it is physically impossible to get a blooie line discharge 125' from the wellhead and keep the discharge end within the confines of the reserve pit unless the well is off-centered on the location.

40 3. Steep Slope Stipulation - 60 percent slope is more realistic. A 40 percent maximum slope would shut down most oil and gas activity.

67 6. What is the reason for the two specifications for fence construction?

Table C-1

53 General - Hauling in of good topsoil to areas where there is poor or little topsoil forces an operator to restore an area to better condition than originally, at significantly greater cost. In areas like this there is generally little or no vegetation anyway. What good is accomplished in establishing an oasis in the middle of a desert?

68 Oil & Gas Drilling - Forcing an operator to schedule casing and plugging programs so that a BLM representative can be there will cause undue financial hardships. These operations can take place at any time of the day or night. If a rig and crew have to wait for a BLM representative to get there, costs can mount. It should be the responsibility of the BLM to be there so as not to hinder operations.

Summary

Proposed rulemaking such as this constitutes a continued effort by the Bureau of Land Management to burden the Oil & Gas Industry with more red tape and greater costs.

Sincerely,

Dennis Sandoval

Dennis Sandoval
Right-of-Way Agent

DS/b

88

PHILLIPS OIL COMPANY
A SUBSIDIARY OF PHILLIPS PETROLEUM COMPANY

DENVER, COLORADO 80237-2800
8055 EAST TUFTS AVENUE PARKWAY

July 17, 1985

Forest Littrell, Area Manager
Bureau of Land Management
Grand Junction Resource Area
764 Horizon Drive
Grand Junction, Colorado 81506

Gentlemen:

These comments are in response to the opportunity for review and comment on the Draft Resource Management Plan and Environmental Impact Statement regarding the resources of oil and gas within the Grand Junction Resource Area. In this regard your efforts as demonstrated throughout this plan are to be commended for the organization of these efforts.

Within Chapter One, the comparison of accessibility to resource potential as one of the planning criteria is vital for equitably considering the mineral resources in planning. In similar fashion, utilization of available or unavailable acres for management of a given resource would seem a workable and realistic means to the end of recognizing resource allocation for management in any specific area. This continuity of thought is carried forth through referencing the effects of management actions analyzed as to the nature of the impacts from such actions. Analysis of the various alternatives through the tables comparing acreages under each alternative's impact by category of potential allows for ready comparison. In light of the nature of the above consideration, our concerns regarding the "Comparison of Alternative Impacts" are somewhat relieved, though this representation troubles us with the indices accompanied by no detailed explanation as to the manner in which they were literally determined. With the earlier analysis evident and without further comment on specific areas, we feel efforts must surely have been exercised explicitly for developing this table; consequently, it could have been most helpful to have had further comment as to these efforts. It is unclear whether a "Net Energy Analysis" would correct any effects derived from utilization of these comparisons, though for the implications this effort may have on management direction when working with specific situations, a concern seems justified.

In more closely reviewing the Commodity Alternative, some concerns must be raised considering the generalized statements that should be considered beyond simply reading the statement as it can most easily be read without sufficient accompanying qualifications for the statement to be as accurate or substantive as it should be. In this regard, the following are examples in which this seems to have occurred. Within consideration of impacts on recreation, degradation of recreational settings does not need to occur

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necessarily, or even as readily as the statement pertaining to this in the Plan would imply when taken literally and singularly. Oil and gas industry operations can be and often have been so closely controlled by prudent operators as to mostly avoid lasting impacts. The technology and techniques utilized in reclamation have further reduced the likelihood of any irretrievable losses in surface values. Often recreational opportunities are improved through access provided though such instances have been at the election of the managing agency and within constant and well controlled guidelines. As the industry's activities are responsibly handled by prudent operators, so are the effects diminished beyond the implication of the earlier referenced statement. Within the similar consideration for visual resources, the comment regarding oil and gas operations causing degradation of the recource is too brief and perfunctory and should be much further qualified with an attending explanation in some detail.

In conclusion, the graphic representation, "Comparison of Impacts by Alternative" is a helpful summary and is an effective means to the end of a conclusion to these planning efforts. Though the Commodity Alternative represents our choice of the alternatives, the Preferred Alternative is deserving of a similar consideration for support, and given the many resources and associated interests for which you have been given responsibility in planning efforts, it should be supported as the Preferred Alternative. It is recognized the the figures in acreage by comparison amongst the various alternatives on the basis of accessibility determined by stipulation etc. may have little bearing on the operator who whose specific area of interst is not to be encumbered. To solely judge on the basis of acreage figures an alternative most agreeable to one individual may not take into consideration the specifics of concern to others as it is assumed this will be considered suitably in the "Net Energy Analyses." It is hoped that with the good effort displayed within this Plan that those involved in the areas impacted by this Plan as prudent operators from within the oil and gas industry can rely on the Plan remaining sufficiently flexible as it is general in focus to enable realistic planning for the industry's efforts. This should only serve to support further the pragmatically effective yet general focus of the Plan.

This opportunity to offer comment on the Draft Plan and Environmental Impact Statement is appreciated.

C. R. Wellendorf
Landman

CRW/ca

89

Independent Petroleum Association of Mountain States
1214 DENVER CLUB BLDG • DENVER, COLORADO 80202-4167 • (303)623-0887

July 17, 1985

Bureau of Land Management
Grand Junction District
764 Horizon Drive
Grand Junction, CO 81501

RE: Comments: Grand Junction Resource Area Draft Resource Management Plan and Environmental Impact Statement, March, 1985.

The Independent Petroleum Associatoin of Mountain States (IPAMS) approaches the opportunity to comment.

The difficulty in arriving at solutions that will balance the needs of all users of public lands are obvious. The Draft RMP is an impressive effort to achieve the goal of balancing the needs of all users.

IPAMS members were encouraged to attend the briefings you have held. They have been active in exploring the meanings of the Draft RMP and have responded in separate statements.

The concerns voiced by our members are supported by IPAMS as an association. We are taking action to be responsive to your efforts to understand the needs of the oil and gas producers. We hope that the comments of IPAMS member Walter S. Fees will be given particular notice. We will look forward to receiving your responses to the industry concerns raised by their comments.

Sincerely

Francis C. Wilson, II
Executive Director

90

TXO PRODUCTION CORP.
1660 LINCOLN CENTER BUILDING
DENVER, COLORADO 80264
TELEPHONE (303) 861-4246

July 17, 1985

Mr. Forest Littrell, Area Manager
U.S. Bureau of Land Management
Grand Junction Resource Area
764 Horizon Drive
Grand Junction, Colorado 81506

Re: Draft Resource Management Plan and EIS

Dear Mr. Littrell:

TXO Production Corp. has reviewed the referenced document and provides the following comments. As an oil and gas operator active in the Rocky Mountain area, TXO has drilled numerous wells on BLM lands in Colorado, Utah and Wyoming, including several wells on federal lands managed by the Grand Junction Resource Area and affected by the proposed Plan. TXO is generally supportive of the thoughtful and well written nature of the document and with the balanced resource management approach of the Preferred Alternative. The comments presented below focus primarily on the minerals (oil and gas) aspects of the document.

40 The Preferred Alternative (PA) offers a middle ground between the Commodity and Protection Alternatives, particularly with regard to leasing restriction recommendations. While this middle ground approach is more reasonable than the Protection Alternative, an inspection of Table 2-6 suggests that some of the acreage restrictions in the PA may be unwarranted. Most restrictions, for instance, are associated with soils management (specifically steep slopes) and visual resource management concerns. The steep slope stipulation, as presented in Appendix E, appears to be overly restrictive with the 40 percent cutoff. As an active operator in the Book Cliffs region in Colorado and Utah, TXO has, out of necessity, constructed roads on slopes in excess of 40 percent that have resulted in well site access for energy development on suitable terrain and without excessive, unacceptable environmental impacts. Although the stipulation provides for a waiver under certain conditions, our experience has been that such waivers are difficult to obtain at the staff level because of the written "policy". Since the 40 percent restriction has the potential to restrict access to lease areas with more level terrain, we strongly recommend either lessening the restriction (to 50 percent) and/or providing policy direction to allow sufficient flexibility with the waiver statement so that oil and gas leases can be fully developed where suitable terrain exists for well pads. In part, this would require use of this stipulation during the APD (development) stage rather than in the leasing stage.

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Mr. Forest Littrell
U.S. Bureau of Land Management
July 17, 1985
Page Two

39 Also, the large acreage restrictions in the PA associated with visual resource concerns seem unjustified. Oil and Gas wells can be drilled in sensitive environmental settings without disrupting unique geologic features or adversely affecting visually prominent areas. Again, a number of the restrictions may be more suitably applied at the APD stage than in the leasing stage, thus giving the operator flexibility in well placement and access road design required for lease development.

The PA recommends dropping the Demaree Canyon, Little Book Cliffs and the Palisade WSA's from wilderness consideration. TXO supports this action, particularly for the Demaree Canyon and Little Book Cliffs WSA's, because of the recognized high mineral potential of these areas. TXO has had several well prospects on the Demaree Canyon WSA, none of which has been drilled, in part due to the restrictions associated with the wilderness IMP. Returning these areas to multiple use as described would facilitate resource development. However, much of the natural character of these areas would not be adversely affected due to use of appropriate surface protection stipulations.

54 Appendix C presents standard design practices (SDP's) regarding project design, reclamation and other procedures as potential stipulations in the project (APD) approval process. While most of these SDP stipulations are well thought out and presented and can facilitate oil and gas development without causing undesirable impacts, their use needs to be environmentally justifiable, economically reasonable, and prudently imposed. For instance, removal and offsite disposal of drilling fluids, recontouring a well pad to original contour, hauling in topsoil, and reseeding with a seed mix that includes pinyon and juniper seedlings represents an extreme end for rehabilitation of a wellsite. Such extreme measures should be employed only in unusual circumstances involving particularly sensitive environmental settings. Imposition of restrictive stipulations and SDP's on a proposed well should be considered on a case-by-case basis with opportunities for discussion of the restrictions rather than a carte blanche approach associated with a selected alternative in the RMP.

TXO Production Corp. appreciates this opportunity to comment on the Draft RMP and supports the basic tenor of the document and the selection of the Preferred Alternative as rational and defensible. We feel that some adjustments need to be made with certain restrictions, including no surface occupancy, steep slope, and visual resource protection stipulations as well as the manner in which the SDP's and other stipulations are imposed. However, the PA generally appears to provide reasonable flexibility for economic oil and gas development without compromising important environmental values.

Very truly yours,

TXO PRODUCTION CORP.

Charles K. Curlee
Environmental Manager

CKC/gtp

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NORTHWEST PIPELINE CORPORATION
ONE OF THE WILLIAMS COMPANIES

July 15, 1985

Bureau of Land Management
Grand Junction District
764 Horizon Drive
Grand Junction, Colorado 81501

Dear Forest:

Please accept the below listed comments in regard to the Grand Junction Resource Management Plan; March, 1985 Draft.

A) Paleontological Resource Management

73 To outline the entire surface exposure of the Morrison and Wasatch formations in the Grand Junction Resource Area and then classify this 433,760 acres as a Class I paleontological area can be termed unrealistic and overly restrictive to a multiple use planning approach. To try and establish a program for paleontology identical or even similar to the cultural resource program is like comparing apples to oranges. In other words, the two resources and their depositional environments are distinctly dissimilar, including the laws, regulations and policy for administration.

As stated in IM. No. 85-68, one of the objectives of paleontological resource management is to protect paleontological resources considered to be of significant scientific interest. The delineation of the entire surface exposure of the Morrison and Wasatch formations as Class I and then require surveys for all surface disturbing activities is unrealistic for the below listed reasons:

- Economics: Will industry or the BLM be required to pay for the survey and report? There is little doubt that industry and the public will foot the bill.

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- As stated on Page 152 - Impacts on Paleontological Resources "these areas have a very high probability of fossil occurrence". This may or may not be a true statement; however, the probability of finding a significant fossil is extremely rare. Possibly the planning document could be more specific - what is the probability of finding a significant paleontological resource in the 433,760 surface acres of Class I designation? Does this infinitesimal probability justify the cost and time delays for both the BLM and industry?

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- Rather than delineating the entire 433,760 acres of Wasatch and Morrison as Class I, can the BLM utilize qualified paleontological specialists to delineate areas of probable significance? The Fruita and Rabbit Valley designations are good examples. Site specific areas that produce an abundance of fossils are relatively well known by both the BLM and public. The site specific approach would serve as a more viable solution for all concerned.

- Industry has become more educated and cooperative concerning all resources and their specific needs for protection, mitigation, etc. However, an unrealistic approach and implementation of such a program can result in a great deal of frustration and distrust for both industry and the BLM. A simple shutdown stipulation generally achieves the protective results for significant fossil finds. Many of the recent significant finds have been produced by construction personnel that have shut down operations and reported the resource on their own accord.

- The designation of the 433,760 acres as Class I may provide the greatest degree for protection of all surface fossils regardless of significance. However, it is unlikely that this blanket designation is a workable approach that will protect buried significant fossils.

B) Wilderness Study Areas

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If an operator-producer is allowed to drill and indeed completes a producing well in a WSA (pre-FLPMA lease); a pipeline will be required. The plan addresses the drilling of the wells; however, the required pipelines should also be addressed. As BLM has no option but to approve APDs on pre-FLPMA leases, pipeline routes must also be approved in order to market the resource in a timely manner. Again this issue should be addressed.

The Resource Management Plan is comprehensive, well written and does address most of industry's concerns for mineral and utility development. However, the paleontological program is of primary concern due to the nonspecific and open-ended approach. Thank you for the opportunity to comment concerning this important document.

Sincerely,

Gary Roberts
Property Rights Specialist

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GRAND JUNCTION CYCLE BOARD (G.J.C.B.)
O.R.V. USE PROPOSAL FOR THE GRAND VALLEY
GRAND JUNCTION RESOURCE AREA

The following is a draft proposal submitted in answer to B.L.M.'s request for suggested RMP revisions. The area the G.J.C.B. is concerned with is B.L.M. land from 18 Road East to 32 Road, North of Grand Junction and Fruita to the Bookcliffs. The Grand Junction Cycle Board/W.S.R.A. and the Grand Junction Area Off-Road Coalition would like to work with the B.L.M. to incorporate these proposals into the final R.M.P.

The G.J.C.B. shares several views with the B.L.M. We support the closing of Mount Garfield and any other land directly in public view. We feel that the main problem with O.R.V.'s (specifically motorcycles) is IMMEDIATE visual impact and noise. Therefore, we are supportive of any closures around populated areas (1/2-mile distance). We are not against being quoted on this point. We would also be happy to assist the B.L.M. with public awareness problems, sign maintenance, looking after mandatory protection areas, etc. Incidentally, it disturbs us to note that some people are using the areas south of the Bookcliffs and slightly east of 27 1/4 Road for a trash dump, this including several existing fire rings, as well as our Cycle Park. We would be very willing to assist the B.L.M. with any programs to deter dumping in the desert.

The Grand Junction Desert is an area unique to itself, as the B.L.M. is well aware. It is the G.J.C.B.'s view that proper O.R.V. management would cause a negligible salinity (sediment) increase, even with virtually the whole desert open. We feel natural erosion is the damaging factor in the salinity problem, along with agriculture. We therefore would like to see the entire desert left open, with the exclusion of the areas mentioned above. Operating on the premise that this is unlikely to happen, we would like to work with the B.L.M. to help initiate the Preferred Alternative, with several revisions that apply to the desert area North of Grand Junction.

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The major revision would be the following: the area from 27 1/4 Road West to 18 Road, North of Grand Junction and Fruita would be open to Desert racing events. Each event would utilize a race couse consisting of at least 75% existing roads and trails, and up to 25% virgin territory. We feel that drainage wash beds should also be open to unlimited use, since they are areas of intense natural erosion anyhow. We would attempt to limit our race courses to areas of high natural erosion and and areas that presently support little or no vegetation, thus minimazing the potential for root system destruction, and resultant increased erosion problems. Any vegetated virgin areas used for race courses would be allowed to revegetate for a minimum of 5 years before they were used for a race course again. This is more than adequate time for revegetation to occur, since we have observed race courses previously used only 12 to 18 months ago, and the exact location of the course is already virtually unrecognizeable, except to someone who knew where it was originally. There would be a limit of 400 riders per year (This would NOT include closed circuit racing -- motocross. Motocross racing would remain confined, as it presently is, to the Grand Junction Cycle Park, North of the West end of the airport runway on 27 1/4 Road.). Current desert racing rider participation is a very small fraction of the above number. This would leave sufficient room for growth of the sport.

We would like to be able to to race under this proposal without any restrictive measures (i.e., special permitting, physical review of the course by B.L.M. personnel, etc.). For any large races on the order of 200 to 250 participants, we would be willing to submit to the B.L.M. a map showing the race route in detail. We would provide transportation for a B.L.M. employee to look at the course, if the B.L.M. feels that such inspection is necessary; and provided such inspection is done during regular B.L.M. working hours, and at no additional expense to the G.J.C.B. We currently feel we have a good working relationship with the B.L.M., and would like to continue to work with them as we have in the past, with minimal interference and supervision. We feel that any more involved and expensive permitting procedures would increase the costs of putting on a race out of reach of our budget, and would therefore effectively prohibit our holding races, thus limiting our recreational freedom.

SUMMARY

We hope this proposal will allow for recreational freedom and growth of our sport while protecting the natural beauty of the desert and helping to preserve water quality in the Colorado River drainage area. This is a draft proposal; we welcome the opportunity to discuss any aspects of the proposal with the B.L.M. prior to its incorporation into the R.M.P.

Submitted by: Suzanne Kupelian, President, G.J.C.B./W.S.R.A.
Robert Hailes, Desert Competition Chairman
Phone: 434-0445 Date: 7-15-85

RESPONSES TO PUBLIC COMMENTS

RESPONSES TO PUBLIC COMMENTS

Table 3 responds to comments identified during the public comment period. The response numbers correspond to numbers in the margins of the hearing transcripts and comment letters. The commenter numbers correspond to the numbers in Tables 1 and 2. The commenter numbers indicate the source of the comment—either letter or transcript.

Responses are arranged by resource. Responses explain why a particular issue was or was not addressed, state whether a text change was made, and refer to the section on text changes, when applicable. The responses must be read in conjunction with the comments.

Table 3. Responses to Public Comments

Response No.	Commenter No.	Response
		AIR QUALITY MANAGEMENT
1	62	The Grand Junction RMP EIS clearly recognized air quality management as an integral element of multiple resource management. Air quality issues were identified and addressed (p. 13), planning criteria were established (pp. 15 and 21), management actions were summarized (pp. 25 and 26), and potential impacts under varying management alternatives were identified (pp. 146, 165, 181, and 200). Throughout the process, compatibilities/conflicts with other resources were identified and, when necessary, resolved (e.g., off-road vehicle management and fire management). To summarize, air quality management is implemented through reviews of site specific plans for proposals affecting BLM and adjacent lands for compliance with existing air resource laws and policies, incorporating mitigation where necessary to reduce air quality degradation (pp. 25-26).
2	62	Quantitative predictions of air quality impacts from cumulative and secondary growth emissions are not possible without identifying specific development scenarios. The BLM routinely analyzes these potential impacts through development of specific environmental assessments. The Colorado Department of Health, in association with the U.S. Environmental Protection Agency (Region VIII), predicted the cumulative impacts of energy development in northwestern Colorado (both direct and secondary impacts) in a general overview which may be of interest (Assessment of the Cumulative Environmental Impacts of Energy Development in Northwestern Colorado, by Paul Ferraro and Paul Nazaryk, Colorado Department of Health, March 1983), but the predictions are wholly dependent on the assumed development scenario.
3	62	The draft RMP EIS states (p. 113): "Most of the resource area has been designated a PSD Class II attainment area. An area including Grand Junction and the Grand Valley northwest to Fruita is the Mesa County designated nonattainment area for TSP. Colorado National Monument is a state Category I area and has been recommended for PSD Class I redesignation." The following criteria established 18 Category I areas in Colorado effective October 27, 1977. (The Colorado National Monument is included in item b.) "The following areas of the State are hereby designated as Colorado Category I. "a. All existing National Parks; "b. All existing National Monuments of at least 5,000 acres in size; "c. All existing Forest Service Wilderness or Primitive Areas of at least 5,000 acres in size; "d. Gunnison Gorge Recreation Area."
4	62	The draft RMP EIS states in part (p. 113): "Colorado National Monument... has been recommended for PSD Class I redesignation" and "The State of Colorado has the authority to reclassify these areas (WSAs), or any other lands, if they wish." On June 25, 1980, the Secretary of the Interior served notice that Colorado National Monument has "air quality related values as important attributes," under "redesignation recommendations" requirements of the *Clean Air Act* (Section 164c). In conjunction with the State Air Quality Control Commission, the Colorado Department of Health is preparing the necessary "redesignation discussion" to describe and analyze "the health, environmental, economic, social, and energy effects of the proposed redesignation" (40 CFR 52.21g). Any further action would be speculative.
5	62	The draft RMP EIS states (p. 113): "Future development of major emitting facilities within the Mesa nonattainment area will be severely restricted until ambient TSP values are reduced. Given the interest in oil shale development and existing industrial development, it is possible that the entire PSD Class II increment may become fully allocated, precluding further major developments." These statements are consistent with the Colorado State Implementation Plan to bring the Mesa nonattainment area into compliance. These statements are also consistent with past air quality modeling results. The draft RMP EIS made no attempt to predict how much industrial growth could be accommodated under the Colorado National Monument Category I increment for sulfur dioxide. Quantitative predictions of air quality restraints to industrial growth are not possible without identifying specific development scenarios.

Table 3. Responses to Public Comments—Continued

Response No.	Commenter No.	Response
6	73	The summary of air quality management actions stated (p. 25) "Proposed projects would comply with all applicable local, state and federal regulations to limit air quality degradation" and "Site-specific project plans for proposals affecting BLM and adjacent lands would be reviewed for compliance with existing laws and policies protecting these areas. Mitigation would be incorporated into project proposals to reduce air quality degradation." The BLM is unable to provide specific associated proposed actions and quantification of anticipated emission levels for vegetation manipulation until site specific projects are proposed.
7	86	On April 20, 1984 (49 FR 16780), the U.S. Environmental Protection Agency changed the boundaries of the Grand Junction Urbanized TSP nonattainment area (see Changes to the Draft RMP EIS section in this document, Map 1). As a result, ORV activity on public land north of Interstate 70 will be over a half mile away from the nonattainment area. Higher total suspended particulate concentrations would occur intermittently in the area of ORV use as a result of fugitive (road) dust. Since fugitive dust particulates are larger than those produced in combustion processes, they settle relatively quickly and present a minimal inhalation health threat. Additionally, ORV closures and restrictions would limit the spread of ORV activity but would not necessarily concentrate or increase use of ORVs in the 27½ Road to Mount Garfield area.
		SOILS MANAGEMENT
8	57	The wide variation in soils, types of surface disturbance, and other causes of soil erosion require mitigation on a site specific basis. The draft RMP EIS addresses this on page 26, Implementation section of Soils Management. The *Grand Junction Grazing Management Environmental Statement* also identifies the need to increase productivity by reducing accelerated soil erosion; various management actions listed in the environmental statement help achieve this goal.
9	62	The additional 500 acres of critically-eroding soils in Cactus Park cannot be included for treatment because these soils are located in an area recommended for wilderness designation.
10	86	Best management practices (BMPs) are presently being applied as part of the land management program and will continue to be applied as necessary. An overall assessment of risk and management options (including BMPs) will be made on all soils having a high susceptibility to erosion. Monitoring will be done through the range trend analysis.
11	86	The Mesa Verde Formation in which the coal lies is at least 2,000 feet below the areas of soil slump identified for No Surface Occupancy for oil and gas leasing. The beds dip to the northeast, and there should be no effect on the soil slump area. The effects from potential mining on soil slump would also be reevaluated during tract delineation.
12	86	The sediment control structures are described in detail in the Grand Valley Watershed Management Plan. Their purpose is to keep naturally-produced sediment and the accelerated erosion caused by ORV use in the watershed, preventing the majority of it from entering waterways. See also response 192.
		WATER RESOURCES MANAGEMENT
13	24	No salinity control efforts are proposed for WSAs within the resource area. Therefore, the designations should have no effect on the salinity control efforts in the Colorado River Basin.
14	51	The type of salinity and sediment control proposed would not impact any wetland and riparian habitat. Small retention structures would be constructed in dry washes. These structures would be designed to contain saline sediment and should impound water. Instream control structures designed to reduce channel erosion and incorporation of salinity and sediment objectives in allotment management and other plans are also proposed. The control of saline sediment would probably improve water quality in the perennial streams, and the impounded water might increase wildlife habitat.
15	62	In a limited number of instances, acquisition of water rights by purchasers and developers might not be possible. Approximately 10 to 15 percent of the land proposed for disposal would be in the river administration area you have described. An undetermined number of applicants may be interested in acquiring water rights but probably would develop springs rather than wells. The assumption relates only to BLM-initiated projects. Stock ponds, wells, and spring developments are the types of facilities that would be constructed. In most cases water rights acquisition would not be a problem and, therefore, the assumption was made for impact analysis only.
16	62	All areas with development potential within the resource area have been mapped by the U.S. Army Corps of Engineers on 7½ minute quads. BLM also has published reports prepared for HUD and other Corps publications prepared for the Western Colorado Regional Planning Commission and the City of Grand Junction and Mesa County delineating flood plains.

Table 3. Responses to Public Comments—Continued

Response No.	Commenter No.	Response
17	86	This type of monitoring would determine whether actions are consistent with current policy, whether original assumptions were correctly applied and impacts correctly predicted, whether mitigation measures are satisfactory, whether significant changes have been made in related plans of other federal agencies or state or local governments, or whether new data is of significance to the plan. The RMP record of decision will outline monitoring procedures for specific actions identified in the plan. Monitoring would also help to establish long-term use and resource condition trends and provide valuable information for future planning. Ultimately, monitoring and evaluation would determine whether maintenance, amendment, or revision of the plan would be warranted.
18	86	Little Dominguez Creek, totaling approximately 2,400 acres, was eliminated from the Preferred Alternative because it is an area recommended for wilderness designation. As such, no mechanical equipment or erosion control structures could be constructed, eliminating treatment opportunities. Jerry Gulch and Coal Canyon, totaling 3,600 acres, were eliminated because the areas do not have reasonable treatment potential. The hydrologic regime is very flashy, making engineering design and construction costs very high. The very high costs coupled with limited benefits resulted in a very low benefit cost ratio.
19	86	Saline seep areas for sediment control are not proposed.
20	86	Activity plans will identify monitoring needs for the specific watersheds being treated. Those needs generally include the additional concerns you have listed above. See also response 17.
		COAL MANAGEMENT
21	A10	The area was shown only on the Protection Alternative map and in the Coal Unsuitability Appendix (pp. 249-262, draft RMP EIS). The watershed is unsuitable for leasing under all alternatives, as indicated in Chapter 4.
22	A10	The areas in question are now under leases and are being developed. Coal unsuitability criteria were not applied to existing leases through this plan.
23	A10	In this situation, significant subsidence would be subsidence with surface expressions that could impact surface water, resulting in a loss of all or a portion of that surface water.
24	A10	The 14,100 acres excluded are in areas that would be difficult to mine; 4,100 acres are under the Colorado River, posing obvious technical problems, and 10,000 acres are in the Palisade municipal watershed. The Palisade municipal watershed is unacceptable pending further study to determine whether mining would have an adverse effect on the watershed. If the study shows that mining would adversely affect the watershed, mining companies would have to mitigate adverse impacts. This mitigation would make coal mining very expensive. Page 151 refers to a conflict between coal and oil and gas development with regard to the amount of coal needed to be in place to protect oil and gas wells. The two examples cannot be compared.
25	A10	The statement "identified as unsuitable" has been deleted (see Changes to Draft RMP EIS section in this document).
26	A13, 59	The Bureau of Land Management has no unilateral authority to exchange a lease; also, the companies holding leases in this area have not indicated a desire to exchange those leases. If that situation were to change (i.e., the company would express an interest in exchanging), the RMP could be amended.
27	C9, C10, 10, 73	The WSAs will not be available for leasing until such time as Congress releases them from consideration as wilderness. The other areas considered suitable for coal leasing were evaluated by resource specialists to determine if surface facilities or other surface impacts would adversely affect those resources present in those areas. The results are outlined in Appendix D of the draft RMP EIS (pp. 249-262). Land use planning is the first step in the BLM's multiple level coal leasing decision making process. Though coal leasing is not expected to be a major activity in the early years of this plan, the BLM wishes to maintain maximum flexibility in the location of future coal lease tracts and facilities. Management considers this flexibility critical to future conflict resolution and the selections of the "most appropriate" coal tracts for leasing.
28	51	BLM responded to this comment under separate letter to the Fish and Wildlife Service.
29	59	Resources such as primitive recreation and outstanding natural features were considered during multiple use tradeoffs. The concern that could not be addressed without further information was the impact of surface facilities on the wild horse herd, the reason for the study.
30	60	The boundary of the watershed and the impacts of mining on the watershed are now being studied by U.S. Geological Survey. Based on the results of that study, the boundary and possibly the recommendation for leasing may be modified.

Table 3. Responses to Public Comments—Continued

Response No.	Commenter No.	Response
		OIL AND GAS MANAGEMENT
32	59	The Interior Board of Land Appeals (IBLA) directed BLM to prepare a new environmental assessment and (1) determine, in light of additional data and analysis, whether an environmental impact statement was called for in analyzing the oil and gas development in the Little Book Cliffs Wilderness Study Area (WSA), (2) include an evaluation of the cumulative impacts of oil and gas development at specific proposed sites, and (3) discuss the influence of Departmental policies concerning nonimpairment in management of wilderness study areas in regard to valid existing rights under pre-FLPMA oil and gas leases. The analysis requested was incorporated into the ongoing Grand Junction RMP EIS to reduce paperwork in accordance with CEQ 1500.4(k). The site specific analysis requested is located in Appendix E, the cumulative analysis is located in Chapter 4. The analysis addressed the pending applications for permit to drill (APDs) and anticipated new wells for the next 20 years for the Little Book Cliffs and Demaree Canyon WSAs (p. 145, draft RMP EIS). Since the analysis addressed the cumulative impacts of the pending APDs and anticipated development for the next 20 years, additional NEPA documentation would only consist of site specific review to determine if impacts of APD approval were within the scope of the impacts analyzed in the EIS. At the level of analysis contained in this RMP EIS, it does not lead us to believe the impacts are significant. The site specific reviews of the pending APDs are located in Appendix E. Additional development above the 31 wells projected for the Little Book Cliffs area and 33 wells projected for the Demaree Canyon area would require an environmental analysis to determine whether an EIS is necessary. The RMP EIS will not be forwarded to IBLA for their inspection. Any future protests or appeals regarding oil and gas development will be handled through the normal Bureau protest and appeal process.
33	59	APDs are current for one year following approval. The ten APDs considered in this document have not yet been approved.
34	59	We considered helicopter access but determined that it could so increase drilling costs that the lessee's economic return would be unreasonably reduced. Such a result would constitute an excessive interference with the right to develop a lease. The coal drill holes mentioned in Garvey Canyon were drilled to a maximum depth of 2,800 feet, while the oil and gas wells are often drilled deeper than 5,000 feet. Thus, the size of drilling equipment and the helicopters required to move the equipment is much greater for oil and gas wells.
35	59	BLM stands by its determination (discussed in the draft RMP EIS, Appendix E, p. 270) that suspension of the leases in the WSAs under consideration is unwarranted.
36	59	Future APDs would be analyzed on a site specific basis for determination of impacts not addressed in this RMP EIS. Included in that analysis would be a discussion of alternate well site and access road locations. See also the response 34.
37	62	None of the 624,701 acres are within deer and elk critical winter range; therefore, no lease stipulation would be necessary.
38	64, 72, 73, 76	The no surface occupancy stipulation is necessary to protect sensitive resources that could be seriously impacted by surface disturbance and still provide for leasing and development. The determination of economic feasibility of developing a particular lease is the responsibility of the lessee. Lease configuration is determined at the BLM state office with no input from the resource area. The size of the areas with the no surface occupancy stipulation would normally allow for drainage or, in some cases, directional drilling.
39	64, 76, 90	This stipulation is used only where outstanding scenic or natural values are known to exist. The determination of economic feasibility of a project is the responsibility of the lessee. This stipulation is attached to provide notice to the prospective lessee that more expensive and involved site development and reclamation techniques might be necessary to conduct lease operations. With future requirements known prior to obtaining the lease, fewer surprises should result from conditions of approval for applications for permit to drill. This same rationale applies to the other lease stipulations as well.
40	64, 71, 72, 76, 78, 81, 82, 83, 87, 90	A strict prohibition against use of lands with greater than 40 percent slope could have undesirable effects on oil and gas development. This is not the intent of the steep slopes stipulation. The intent is to notify the lessee that a significant portion of the lease has slopes in excess of 40 percent and that the ability to develop those portions of the lease may be affected. The wording of the stipulation has been changed to better reflect this intent (see Changes to Draft RMP EIS section in this document). Experience has shown the 40 percent slope level to be a fairly good division line between lands that can be developed using standard construction and reclamation techniques (slopes less than 40 percent) and lands that may require special, more costly techniques (slopes greater than 40 percent). Experience has also shown that disturbance of such slopes can often result in unacceptable impacts and, therefore, may not be allowed. Requests for waiver of this stipulation would be handled on an individual basis. The environmental impacts contained in the draft environmental impact statement were analyzed assuming that this stipulation could be waived and that some additional impacts were likely to occur as a result.
41	64	The areas identified as deer and elk winter range are consistent with the most current available information.

Table 3. Responses to Public Comments—Continued

Response No.	Commenter No.	Response
		The requests for waiver of this stipulation would be handled on an individual basis. If an area is not being used by deer and elk and no problems are anticipated, the stipulation could be waived.
42	64, 72, 78, 81, 87	This standard design practice is consistent with resource area policy designed to prevent waste of forest resources. Unless otherwise approved by the authorized officer, this standard design practice would be used.
43	64, 71, 81	Standard design practice 15 was adopted to provide a greater measure of success in culvert installations, particularly on larger culverts. The BLM's interest is served in maintaining access to public land and in preserving culvert fill material for use in reclaiming roads at abandonment. See also response 65.
44	71	The RMP serves primarily as a guideline in directing future management in the area. However, where required by law or regulation, regulatory type information and directions are included.
45	71	The no surface occupancy stipulation would only pertain to new leases since this stipulation would not be consistent with the rights contained in existing leases. As stated on page 266 of the draft RMP EIS, lease stipulations would be added to applications for permit to drill on existing leases to the extent consistent with lease rights.
46	71	The BLM is required by law to protect the habitat of threatened or endangered species. See also response 39.
47	71, 82	This standard design practice has been changed to allow for sewage disposal in bore holes, except in areas where contamination of ground water might be a problem (see Changes to RMP EIS section in this document). It is estimated that approximately 90 percent of the wells drilled are drilled in areas where ground water contamination is not a problem. Bore holes are a safety hazard when they are left open prior to and after drilling. The standard design practice now requires fencing of bore holes prior to the rig moving on and immediate covering when the rig is removed.
48	71	Trash burning presents the potential for fire escaping onto adjoining land. We have not been aware of the problems of trash being scattered along the access road when trash baskets are hauled out.
49	71, 76	Two different standard design practices concern reserve pits. The first one, which requires removal of drilling fluids and recontouring of the pit within 90 days after drilling, has been changed so that it applies only to dry holes within WSAs (see Changes to Draft RMP EIS section in this document). This would allow for rapid reclamation of such wells. The second standard design practice would be applied in all other areas. A one-year drying period is considered to be reasonable. If a pit has not dried sufficiently to allow reclamation within one year, removal of the remaining fluids is justified to facilitate timely reclamation. If hazardous materials were involved, immediate removal would be required. This standard design practice has been added in Table C-1. Proper disposal of such materials would be the responsibility of the operator.
50	72, 76	This standard design practice applies only to visually sensitive areas and wilderness study areas. The intent is to reestablish the original contour lines as much as possible while preventing excessive erosion. Recontouring to match the original contours, along with other measures such as those listed in the scenic and natural values stipulation on page 266 of the draft RMP EIS, are designed to restore the natural qualities to these special areas. In the remainder of the resource area, well sites would be recontoured to blend with the natural topography rather than to match it.
51	76	The areas designated no surface occupancy would not affect any existing lease or lease rights. The stipulation would be attached only to new leases. As the right to transport and sell produced oil and gas is a lease right of all oil and gas leases outside of a WSA, pipelines are also grandfathered.
52	76	Stipulations 9, 10, 11, and 12 include the following paragraph: "This stipulation may be waived or reduced in scope if circumstances change or if the lessee can demonstrate that operations can be conducted without causing unacceptable impacts on the concern(s) identified." Stipulation 4 has been amended to include this paragraph (see Changes to Draft RMP EIS section in this document). This paragraph allows for the restriction to be altered or waived depending upon the conditions existing at the time a project is proposed.
53	76, 78, 81, 82, 87	This standard design practice has been changed to clarify the kinds of situations where this measure would be applied. Under the Preferred Alternative, this stipulation would be applied only in wilderness study areas and visually sensitive areas. The intent of the standard design practice is to allow restoration to the original condition only. In no case would an operator be required to improve a disturbed area to a better than original condition. When the existing topsoil has been lost or mixed with less desirable material during the course of the project, it may not be possible to achieve acceptable reclamation without hauling in topsoil.
54	77, 78, 81, 82, 90	The standard design practices included in Appendix C are not intended to be an exhaustive listing of all possible practices that could be used on proposed projects. Neither are they considered to be unchangeable or all encompassing. All standard design practices can be altered or waived with the authorized officer's approval. The standard design practices are intended to represent the range and variety of the types of practices that may be used in order to meet the requirements of law and also to achieve the management goals of the various alternatives.

Table 3. Responses to Public Comments—Continued

Response No.	Commenter No.	Response
		Only those standard design practices appropriate to a given proposal or situation would be used. It is anticipated that the standard design practices will be reworded or changed to fit particular situations. The standard design practices applicable to each project would be selected on an individual basis in consultation with the project initiator. The least costly method that will give the desired result would be selected.
		Some of the listed standard design practices would be used only in specialized or extreme cases. Where necessary, the wording of such practices has been changed to indicate the kinds of situations that would justify their use (see Changes to the Draft RMP EIS section in this document).
55	78	Restoring ground vegetation is only part of the goal of site reclamation. Also included is the quick establishment of species that would control erosion and not be out of character with the surrounding plant community. To this end, we specify the species and time of seeding that would provide the greatest opportunity for successful revegetation. See also response 90-3.
56	78, 81	As shown in Table C-1, draft RMP EIS, page 245, this standard design practice would only apply to the Protection Alternative in order to minimize the amount of surface disturbance, vegetation loss, and soil erosion. These benefits are consistent with the objectives of that alternative. In the other alternatives, pipelines are generally preferred along the access roads, but other concerns justify cross-country routing. Such concerns include slope steepness, length of pipeline, visual prominence, and cost to the pipeline company.
57	81	A plate mounted flush with the ground would allow persons to locate themselves in the field relative to a map and would not present a visual distraction. See also response 59.
58	82	The local (district and area) BLM offices do not have any input into defining lease boundaries to improve the feasibility of lease development. Lease boundaries are presently set at the BLM state office and will probably continue to be done in this manner as many other leasing functions are located in the state office.
59	82	The text has been changed to require a plate mounted flush with the ground in visually sensitive areas and wilderness study areas only (see changes to the Draft RMP EIS section in this document).
60	82	Approval to suspend misting during cold weather could be approved by the authorized officer on an individual basis subject to other suitable containment of cuttings. The reference to the blooie pit being located in 50 percent cut has been deleted (see Changes to the Draft RMP EIS section in this document).
61	82, 87	Access road width was not specified in the standard design practices. Operators are encouraged to apply for the width of road they will need. As stated in Pipeline Standard Design Practice 4 on page 242 of the draft RMP EIS, in areas adjacent to or crossing access roads, pipelines would be buried with a minimum of 4 feet of cover in alluvial areas and 3 feet of cover in rocky areas. Pipeline companies and oil and gas operators are equally responsible for maintenance of access roads along the pipeline, and the BLM encourages maintenance agreements between these parties.
62	83, 91	The environmental impacts of authorizing pre-FLPMA APDs in the Demaree Canyon and Little Book Cliffs Wilderness Study Areas were analyzed, including impacts of pipelines to producing gas wells (see Oil and Gas Assumptions, page 145, draft RMP EIS). Pipelines required to produce pre-FLPMA lease wells are interpreted as part of the rights inherent in the mineral lease to develop that lease subject to the terms and conditions of the individual lease.
63	87	While we do not particularly need to be notified for road maintenance activities, we do appreciate notification in order to keep informed of activities in the resource area. Maintenance activities can be defined as any activity undertaken to maintain the physical function of a given oil and gas operation. Notification of maintenance activities allows for coordination between BLM and the operator/grantee. We believe that coordination between our field people and the operator/grantee's field representative results in fewer misunderstandings and all around better working relationships.
64	87	This practice is occasionally permitted. However, in the interest of reducing waste of wood products and minimizing visual impacts, its use is limited.
65	87	The text has been changed (see Changes to Draft RMP EIS section in this document).
66	87	Pad size would not be restricted to 200 feet by 200 feet. Whenever possible, the location would be adjusted to accommodate a 125-foot long blooie line or additional areas allowed.
67	87	The 84-inch fence would be used on reserve pits within the wild horse range at all times and within deer and elk winter range between December 1 and May 1. The 48-inch fence would be used on all other reserve pits.
68	87	This standard design practice would be used only under the Protection Alternative. It is not included under the Preferred Alternative and would not be used (see Table C-1, Draft RMP EIS).
		MINERALS OTHER THAN COAL, OIL AND GAS
69	C9	Mineral withdrawals were analyzed only where a potential conflict existed between mineral extraction and protection of important surface resources. The areas listed are believed to have low or no potential for locatable minerals.

Table 3. Responses to Public Comments—Continued

Response No.	Commenter No.	Response
70	59	The Gunnison River corridor would be managed as a VRM Class II area. Any mineral materials sales or free use permits would have to meet the VRM Class II requirement that "management activities should not attract the attention of the casual observer" (VRM Manual 8400).
71	73	BLM disposes of mineral materials, both through sale and free use permits, because of existing laws of the United States. The BLM disposal policy for mineral materials impacts local and state governments and other federal agencies more than the general population. Most of our disposals are to these governmental bodies in the form of free use. This assists those agencies by providing materials that they would otherwise have to buy—allowing use of available revenue for other projects. The special management areas were evaluated for mineral material disposal potential and impacts to those sites from development. Areas were closed using those criteria.
		PALEONTOLOGICAL RESOURCE MANAGEMENT
72	C9	The area would be protected under all alternatives. The BLM has signed a cooperative agreement with the Museum of Western Colorado for that purpose.
73	83, 91	Colorado policy requires that paleontological resources be protected through an inventory and classification of formations according to the likelihood of finding significant fossils. With a Class I classification, clearances are required; however, only outcrops would be cleared. Therefore, the entire Morrison and Wasatch Formations would not be surveyed. A change in text clarifies this.
74	84	The lower portion of Hell's Half Acre is privately owned, and only the steeper part is managed by the Bureau of Land Management. Because of this ownership pattern and the fact that the site has not produced many fossils in the past few years, Hell's Half Acre does not lend itself to a research natural area designation. However, the site is known and will be protected through clearances should there be any surface-disturbing activities on the public portion of the locality.
		FOREST MANAGEMENT
75	73	Budget constraints are such that it is impossible to say when the timber production capability classification will be done on the commercial forest land—or when it will be finished and implemented. No funding is presently available to initiate the classification.
76	73	The annual harvest was arrived at by taking the total acres of pinyon-juniper suitable for management times the average volume per acre. This was the total volume in the Grand Junction Resource Area. This total volume was then divided by 180 years (the rotation period for pinyon-juniper in the Grand Junction Resource Area). This was the annual harvest which was then reduced for estimated trespass in the resource area. The location of future firewood cutting areas will be addressed in a woodlands management plan. Site-specific environmental impacts of harvesting the woodlands will be analyzed in that site specific plan.
77	73	The scope of the RMP does not allow for site specific analyses. Locations of roads and other design features will be described and analyzed in more specific management plans following approval of the RMP. These plans will consider benefits versus costs.
		WILDLIFE MANAGEMENT
78	A5	The BLM does not propose to provide habitat for more than the historic populations of deer. It appears from your information that deer have established increasingly strong traditions for grazing certain hayfields in spring and fall. The BLM and the Colorado Division of Wildlife have been exploring ways of dealing with this problem. Projects such as the proposed Castle Rock sagebrush treatment in the Coon Hollow Grazing Allotment was one of the ways.
79	A5	None of the miles of fish stream habitat improvement is proposed for private land and most are upstream from irrigation structures.
80	A5	Page 41 of the draft RMP EIS, right column, second paragraph states the sources of predicted population increases.
81	A5	On pages 13-21 of the draft RMP EIS, the issues addressed, not addressed, and previously addressed were listed, and the planning criteria were expressed. An issue not addressed and not listed was state trespass laws. However, the *Grand Junction Grazing Management Environmental Statement* does address wildlife-livestock conflicts and trespass control (see also 43 CFR 4150 and BLM Manual 4150).
82	A5	The 200 percent increase in deer would occur in the Dominguez Canyon WSA. Deer of this herd summer primarily on the Uncompahgre National Forest. Elsewhere the habitat capacity for increases in deer numbers is a tenth of that figure or less.
83	A5	Until a consensus opinion from private landowners and clear public mandate is received on the question of privately owned forage eaten by state owned wildlife, it would not be appropriate for the BLM to credit this forage use. This is a topic that exceeds the ability of the resource area's resource management plan to resolve.

Table 3. Responses to Public Comments—Continued

Response No.	Commenter No.	Response
84	44	Page 208 of the draft RMP EIS does not predict such a catastrophic loss in wildlife, yet it must be admitted that without limits on the density and rapidity of minerals development such losses are possible. The following points should be noted: (1) the price of the existing leases would be far beyond BLM budgets; (2) the BLM Resources Policy Statement of May 29, 1984, states that the BLM "actively encourages and facilitates the development by private industry of public land mineral resources..." and "land use plans...will recognize that mineral exploration and development can occur concurrently or sequentially with other resource uses."
85	44	Appendix F of the draft RMP EIS lists priorities for developing the habitat management plans (HMPs), which are the specific wildlife planning documents. The BLM planning process directs that an area-wide plan be prepared that is as site specific as is appropriate. Managing wildlife habitat is so complex and expensive in area that the details (the number of water developments, nest structures, miles of protective fence, acres of vegetation treatment, etc.) necessarily await the time of closer scrutiny provided by an activity plan for only portions of the resource area at a time. The public is encouraged to review Appendix F and provide specific advice on desirable wildlife habitat in improvements within the activity plan areas of interest.
86	44	Each habitat management plan will consider what can and should be done for nongame species. Expressions of interest such as yours and financial support of programs such as through the nongame state income tax checkoff can only help to increase the focus of habitat management upon nongame (see also response 85).
87	51	Changes have been made on pages 95, 98, 100, 101, 102, 104, 106 and 108 (see Changes to Draft RMP EIS section in this document).
88	51	Despite the efforts of the BLM to raise the condition of riparian areas, there will probably always be enough area in low seral stages (poor condition). At the next level in the BLM planning system, the habitat management plan, many of these important values you recognize will be specifically covered.
89	51	The following term has been entered into the glossary: "LIVESTOCK TRAIL. A route that livestock (cattle, sheep, horses) are driven over. A route used in the transport of domestic grazing animals by means other than trucking or allowing the animals to drift on their own volition." Portions of several streams in the resource area are livestock drive routes. Permittees "trail" their stock along these routes. The proposal is to not permit more of these than currently exists. The *Grand Junction Grazing Management Environmental Statement* discusses the impracticality of fencing off the 3,000 acres of riparian habitat.
89A	51	The identification of 162,660 acres in the Grand Junction RMP as "suitable for coal leasing but sensitive to coal development" is correct and fulfills BLM's responsibilities under the coal unsuitability regulations (43 CFR 3461, *Federal Lands Review*). None of the 162,660 acres were determined to be unsuitable. In addition, there is no basis in the coal unsuitability regulations for identifying areas as unsuitable with exceptions, as the comment suggested. Although the regulations do not specifically use the term "suitable for leasing but sensitive to development" the RMP clearly describes each area in this category, the unsuitability condition present on the area, and the mitigation necessary for the area to be leased and developed, as is required by the regulations. Any leasing of the areas would be subject to the terms and conditions identified in the mitigation, and any development of the area would be permitted only after compliance with the terms as demonstrated in the Permit Application Package submitted to OSM.
90	51	The glossary term "riparian" includes the edge environment of both streams and other bodies of water (ponds, seeps, springs). Page 91 of the draft RMP EIS states that "wildlife management emphasis would be placed on protecting and improving approximately 3,000 acres of riparian habitat." You correctly understood that to be the total amount. Page 127 states that "only 2,500 acres (of riparian vegetation) exists along perennial streams." That is not the total amount of riparian habitat, but it is generally the most significant and permanent and thus it was singled out.
91	51, 62	Extensive coverage of the effects of livestock grazing is made in the *Grand Junction Grazing Management Environmental Statement*. The diminishing effect on wildlife habitat conditions comes from a generally improving range trend. The potentially negligible impact judgement stems from the concept that recovery from overgrazing implies that the range is returning to a condition similar to the pregrazing state and that this recovery can occur as rapidly under light to moderate grazing as under no grazing (Ellison, L. 1960. *Influence of grazing on plant succession of rangelands*. The Bot. Rev. 26(1): 1-78).
92	51	There is a remnant population of sharp-tailed grouse and a modest population of sage grouse within the Glade Park area. At one time (ca. 1930), there was a significant and huntable population.
93	51	The critical deer winter range in the Little Book Cliffs Wild Horse Range represents almost 10 percent of the total such deer range within the resource area. The management of wild horses on critical deer winter range is the only action being discussed here. Other actions would also allow improvement of the winter range.
94	51	Some of the most resilient range is riparian. Yet it is true that livestock use this type a disproportionate amount. Thus, it is a challenge to manage pastures with riparian range in them. Fencing the riparian range out is our last resort. We reject the hypothesis that overgrazing is a tool, hardly an effective one, in managing for cottonwoods, boxelders and willows.
94A	51	Other issues will be addressed in separate correspondence.

Table 3. Responses to Public Comments—Continued

Response No.	Commenter No.	Response
95	62	The statement might better read "Significant harvest levels have a fundamental relationship to habitat condition where big game densities are near or above the carrying capacity of the habitat."
96	62	It would benefit wildlife and such a statement is made on page 154 of the draft RMP EIS under Impacts from Water Quality Management. The reason there is no wildlife subheading here is because in this small area no action is planned for wildlife that is not already covered by the watershed protective actions, oil and gas special and other stipulations, the coal unsuitability criteria review, standard operating procedures in forestry, and such measures as the closure to off-road vehicles.
97	62	Such a list is available at the Grand Junction Resource Area office. Table 3-5 represents some of the most common, and Table 3-9 includes a few of the least common.
98	62	The text has been changed (see Changes to Draft RMP EIS section of this document).
99	62	You may have recognized that the 30 percent sagebrush proposal does not mean that there is a guarantee that after RMP implementation, 30 percent of the sagebrush lands would remain in sagebrush. In reality the majority of it would remain. The proposal only applies to the areas to be treated. A sagebrush park with a known lek would be avoided or treated only in a manner generally agreed to be beneficial to sage grouse. The Braun et al. paper cites studies that suggest that a 30 percent canopy cover is near optimum for breeding sage grouse. If there is a significant distribution of understory herb species, sagebrush treatments are not likely to be considered where canopy cover is below 40 percent. Braun et al. recognizes the importance of meadow areas, particularly in the higher country. They suggest treatment strips no wider than untreated strips (50 percent minimum leave area) and that strips are preferred over blocks. In the bargaining between resources, it simply was not possible to obtain this high a standard for sage grouse and other sagebrush dependent species.
100	62	The draft RMP EIS is generously inclusive on the definition of perennial water; e.g., Big Salt Wash. Even so, some valuable riparian acres were overlooked by this standard. When greasewood is included, a considerable area along intermittent streams is not protected by the 100-foot buffer stipulation. However, even before the standard is developed on what is valuable riparia, there is a recognition of it (see Glossary). The BLM will abide by Executive Orders 11988 (flood plains) and 11990 (wetlands). Also, the active management of riparian areas would include the vegetation along intermittent streams.
101	62	In these days of tight budgets for resource management, we cannot predict the annual output with even reasonable accuracy. Here are the streams and approximate mileages: East Salt—5; Big Salt—3; Plateau—3.6; Blue—6; Calamity—6.5; North Fork of Mesa—2.4; Roan—5; Carr—5; Brush—2.2; Spring—1.1; West Hawxhurst—1.5; Northeast—3.5; North Fork of Kannah—1.3; Big Dominguez—2; Granite—4.5; Little Dolores—4; Briar—2.9; Bieser—1.7; Lobe—1.5, West—2; North Fork of West—2.7; and Ute—3.7.
102	62	The *Grand Junction Grazing Management Environmental Statement* with revisions recognizes the importance of livestock grazing control on riparian habitat condition. The no surface disturbance measure prevents the permanent loss of the habitat most unambiguously.
103	62	We certainly hope the emphasis on improving habitat quality does not diminish. Also, where we can increase quantity of land inhabitable by highly valued wildlife (reclamation), we ought to do it. The tone of the last Wildlife Society Section Meeting in Grand Junction (ca. 1982) was that we can't accommodate both the inevitable rise in human population and development and also the present numbers of wildlife; but there is much we can do. Is this too gloomy to be accurate?
104	70	See Glossary under Vegetation Manipulation and also page 238 (draft RMP EIS) for a listing of some mechanical treatment types.
105	70	See response 104.
106	73	The Kannah Creek HMP (1985) incorporates a forage improvement project for fall to spring deer range in the Whitewater Creek drainage. It is hoped that this will reduce the nuisance deer in the Watson Creek area. If not, then expansion of the treatment area northward or other measures may be considered. See also response 78.
107	86	The protections proposed include (but are not limited to) the no surface disturbance oil and gas lease stipulation along perennial streams which is applied to other potentially disturbing activities that require permits; inclusion of riparian areas in protective designation such as wilderness, research natural areas, and off-road vehicle closures; and proscriptions against land disposal where riparian vegetation exists. The enhancement of riparian areas would be primarily through actions designed in watershed management plans and wildlife habitat management plans. A habitat management plan is a document that can be reviewed by the U.S. Fish and Wildlife Service and, typically, the Colorado Division of Wildlife is the cosigning agency. See also responses 85 and 86.
108	86	Funding only allowed for a basic riparian inventory of perennial streams and ponds. As funds and priorities permit, there will be a completed inventory. Funding levels are related to the quantity of monitoring that can be done on the results of protective measures, on the frequency of compliance checks on permit holders, on the thoroughness of proposal analysis, and on the number of livestock control structures that can be built and even maintained. Appendix F of the draft RMP EIS gives the priority of the habitat management plan areas yet cannot predict the year of implementation.
109	86	The assumption on the activity plans is correct. The *Grand Valley Desert Watershed Management Plan* has been completed. This document outlines most of the specific projects planned in the desert area. Also, see response 101.

Table 3. Responses to Public Comments—Continued

Response No.	Commenter No.	Response
		THREATENED AND ENDANGERED SPECIES MANAGEMENT
110	A13	The 80-acre Unaweep Seep meets half the criteria for land acquisition listed on page 56 of the draft RMP. These acres have been identified in the Unaweep Seep Habitat Management Plan for acquisition if and when they become available and a land exchange or other means of acquisition can be found.
111	22, 40, 62, 73	The text has been changed (see Changes to Draft RMP EIS section in this document). Table 2-23 (p. 67) has been amended to add 1,520 acres in the Preferred Alternative column under Special Management Areas. Proposed for designation would be the Badger Wash Area of Critical Environmental Concern. The environmental concerns would include a hydrologic research study, sensitive plant species, and a plant association of critical national concern. Also, Badger Wash has been added as an ACEC on page 105 within Area F: Emphasis on Water under Special Management Areas.
112	22	Text changed (see Changes to Draft RMP EIS section in this document). Appendix Table F-4 (p. 282) has been changed to include the Rough Canyon Habitat Management Plan, 15th priority, 1,470 acres and key species emphasis on spineless hedgehog cactus, sensitive plant and animal species. The Wilderness Habitat Management Plan has been shifted to 16th priority. None of the special management areas proposed for designation in the Preferred Alternative are on Map 5. The emphasis areas are mapped, but all the site specific actions within these areas given in Chapter 2 were not mapped.
113	22	Table 3-9 has been changed (see Changes to RMP EIS section in this document). Also the text has been changed to explain that actions would be taken during the permitting process to protect the milkvetch.
114	22	These plant associations have been made known to us, but we know of no good condition sites on public land within the Grand Junction Resource Area. Such sites should be maintained, but the best strategy may not be to hastily throw a formal designation around them. Institutionalizing protections for newly recognized resource values should be a process that does not demoralize support for the more widely recognized resources. Protective measures should interfere no more than necessary. If there is time, highly visible designations should proceed from thorough study showing the need for them. As with sensitive plant and animal species, these sites, if known, can be protected now by stipulation and redirection of human activities on the public land. This is what we propose to do.
115	22	Text changed (see Changes to RMP EIS section in this document). Stipulations can indeed be used to control timber or fire salvage sales, rights-of-way grants, and permits to mine oil shale. Grazing allotment management plans can be revised and, more simply, arrangements to remove the grazing threat to the species can be made with the grazing permittees. Sensitive plants would be protected at their known sites; however, it is true that surveys within potential habitat of sensitive plants would not be mandatory for a permit granting (see p. 95, draft RMP EIS, right column, first paragraph). The definition of "No Surface Disturbance" has been added to the glossary (see also response 116).
116	22	Text changed (see Changes to RMP EIS section in this document). With the addition of Rough Canyon to the list of habitat management plans on Table F-4, there are four habitat management plans that are proposed for key management sensitive, threatened and endangered species. Unaweep Seep Habitat Management Plan has a sensitive species. Documentation of species occurrence will be a never ending process and there will be pre-habitat management plan inventories.
117	22	A no surface disturbance stipulation is too restrictive. The status of the peregrine falcon certainly merits the strongest protective measures. However, there is now a long tradition of protecting peregrine falcon sites with seasonal stipulations and site specific limitation on permanent structures. The sensitive plant species within the 77,300 acres of no surface occupancy included a few known plant sites and a vast area of potential rare plant habitat on the Green River Formation.
118	22	We are very receptive to working with The Nature Conservancy under a cooperative management agreement on a number of the special management areas. We will be contacting you about these agreements following completion of the RMP.
119	51	Environmental assessments will be prepared on specific projects following the general land use allocations authorized in the RMP. The environmental assessments will determine whether specific projects "may affect" threatened and endangered species. If the assessment shows a 'may affect" situation exists, the Fish and Wildlife Service will be contacted for Formal Section 7 consultation. This wording has been added to Chapter 2, Threatened and Endangered Species Management. In addition, all 'may affect" and "jeopardize" terminology has been deleted from the Threatened and Endangered Species sections in the RMP (see Changes to Draft RMP EIS section in this document).
120	51	On page 255 under Coal Unsuitability Criterion 11 (draft RMP EIS), the one-quarter mile buffer zone is an approximation. It continues to assert that "actual buffer zones will be determined through consultation with the U.S. Fish and Wildlife Service." In other words, the one-quarter mile buffer zone is only a prediction of what the actual buffer zones will be.

Table 3. Responses to Public Comments—Continued

Response No.	Commenter No.	Response
		Outside the coal area, the technique of raptor protection would be similar to that for the peregrine falcon eyries. Activities that are proposed within a large general area of high incidence of raptor nesting would signal a check for the occurrence of nests. Buffer zones would then be determined. Following more exhaustive raptor surveys and discussions with the U.S. Fish and Wildlife Service, more rigid buffer zones might be established.
121	51	Text changed (see Changes to Draft RMP EIS section in this document). The added paragraph to page 43 of the draft RMP EIS should explain much about the acreage figures. Maps that enclose river areas of relatively high bald eagle use, cliff areas that are considered to be peregrine falcon habitat, and broad areas where the two cacti species have habitat are available in the Grand Junction Resource Area office for inspection by all supporting agencies.
122	51	Text changed (see Changes to RMP EIS section in this document).
123	51	We believe the statements under the Effects subsection present the realistic environment of change that would apply to any management plan. Then, as demanded by any environmental review, a fair appraisal is made of the differences between alternatives. No alternative claims superior compliance with Section 7 expectations. However, it is undeniable that alternative difference, especially the amounts of wilderness and the non-threatened and endangered species limitations on surface disturbance, would simplify protecting threatened and endangered species.
124	51	The table has been changed (see Changed to Draft RMP EIS section in this document). The acres under the active habitat management heading in Table 2-9 were summed from the data in Appendix F. Appendix F lists wildlife habitat management units proposed under each alternative. These wildlife habitat management units or habitat management plan areas would each place emphasis on the habitat needs of selected species. The species of emphasis would vary among areas and alternatives. The acres under the protective habitat management heading for bald eagle, peregrine falcon and the two federally listed cacti were discussed in response 121. The black-footed ferret acres are discussed in response 139. The acres of sensitive plant species are represented by the area of public land containing oil shale.
125	51	See responses 121 and 124.
126	51	Please note that under the subsection titled Threatened and Endangered Species, in the interest of brevity, federally listed, state listed and merely sensitive species are included. Usually, as in this case, a modifying word identifies the species being discussed.
127	51	The text has been changed (see Changes to the Draft RMP EIS section in this document).
128	51	These acres are in the areas of concentrated prairie dog colonies. Scattered dens are not included.
129	51	The text has been changed (see Changes to Draft RMP EIS section of this document).
130	51	The BLM would (1) require protective measures be taken to prevent the deterioration of the suitability of the area for the species, (2) contribute structures, equipment and manpower to effect the reintroduction, and (3) provide environmental review, site monitoring and interagency liaison and encouragement as appropriate. Admittedly, there is little control that the BLM can exert over the habitat of the bonytail chub.
131	51	The squawfish was added (see Changes to Draft RMP EIS section in this document).
132	51	Appendix F, Table 4 (draft RMP EIS), indicates the areas of active management for the habitat of threatened and endangered species. It is a table of proposed habitat management plans. Thus it would be strategic to initiate Section 7 consultation at the drafting of the plan. See also response 119.
133	51	We will indicate it here that such a site may be designated an area of critical environmental concern or a research natural area.
134	51	No specific action to benefit wildlife will be expended on these areas. The safeguard considerations are discussed on pages 19 and 20 of the draft RMP EIS.
135	51	The table has been changed (see Changes to Draft RMP EIS section in this document). Since it would be quite appropriate for the U.S. Fish and Wildlife Service to rank the endangerment of these species, we have discussed the list as revised with the agency. A ranking of endangerment and an estimate of the species' sensitivity to BLM actions helps in the allocation of scarce dollars.
136	51	Table 3-9 has been changed (see Changes to Draft RMP EIS section in this document).
137	51	Harrington beard tongue has been deleted from the table (see Changes to Draft RMP EIS section in this document).
138	51	*Astragalus debequaeus* has been added to the table (see Changes to Draft RMP EIS section in this document).
139	51	It is generally believed that it was the reduction of the prairie dog population that brought the black-footed ferret to the brink of extinction. It is also believed that there is a threshold prey density (Tim Clark, personal communication 1985). It would not appear practical to guard every prairie dog burrow nor is it realistic to fear a significant loss in the small and sparse colonies.
140	51	The management actions themselves would be beneficial. See also response 123.
141	51	Assuming a winter population of 60 bald eagles with a 20 percent increase in winter kill deer yielding a 17 percent increase in carrion feeding bald eagles is highly speculative and to be substantiated when it happens.
142	51	Note that it is the Protection Alternative that claims to be most beneficial to threatened and endangered species.
143	51	See responses 123 and 142.

Table 3. Responses to Public Comments—Continued

Response No.	Commenter No.	Response
144	51	We are communicating with the U.S. Fish and Wildlife Service (Grand Junction) on raptor surveys that may fill this need.
145	51	All peregrine and prairie falcon dates inclusive for protecting nesting activities from disturbance have been changed to March 15 to July 1. All golden eagle dates inclusive for protecting nesting activities from disturbance are changed to February 15 to July 1. See Changes to Draft RMP EIS section in this document.
146	51	Page 269 under Section 2, Oil and Gas Lease Stipulations, subsection 15 is the reference being sought. See also response 120.
147	51	Included in the other threatened and endangered species are the endemic fishes and the possible reintroduction of breeding peregrine falcons. Riparian vegetation would have the major focus in improving bald eagle habitat.
148	51	The text has been changed (see Changes to Draft RMP EIS section in this document).
149	62	Table changed (see Changes to Draft RMP EIS section of this document). The common names of the animals are standard and better known than are the scientific names; therefore, only the plant scientific names have been added.
150	73	See responses 86 and 124. Table 2-23, as revised, clearly does provide more active management consideration for threatened and endangered species under the Preferred Alternative than under the Commodity Alternative. See Changes to Draft RMP EIS section of this document.
151	73	Both Pyramid Rock and Unaweep Seep have been entered into the Registry of the Colorado State Natural Areas Program. The acreages selected included more acres than that occupied by the nonmobile species to be protected at Pyramid Rock, and the habitat of value at Unaweep Seep was entirely included. The natural boundaries are very visible, and a buffer zone was included.
152	73	Page 100 states that ORV use would be limited to designated roads and trails within Pyramid Rock Research Natural Area. There is a county road along the west end. The security of the threatened and sensitive species here would be strengthened by the management action. However, if the area should become popular as an ORV area, additional measures would be needed to protect the species. Page 108 states that ORV use would remain closed on the Unaweep Seep Research Natural Area; also note that the area is highly unsuitable for ORV use. Grazing impacts were discussed in the *Grand Junction Grazing Management Environmental Statement*. Specifically, grazing studies are in progress on the Unaweep Seep to determine its effects on the valued species. The habitat management plan for the Pyramid Rock Research Natural Area would specify that the effects of grazing on the valued species be monitored.
153	73	On the surface this may seem to be the most guaranteed protective measure. But in most cases an unsuitable classification would give the species habitat area a visual, aesthetic consideration without doing anything for the species that avoidance of the microhabitat would not do. See also responses 114 and 84.
		LIVESTOCK GRAZING MANAGEMENT
154	A5	The economic impacts on the permittees were analyzed in the *Grand Junction Grazing Management Environmental Statement*.
155	A5	The draft RMP EIS listed agencies, groups, and institutions under the Consultation and Coordination Chapter. The ranching community was represented by the Grand Junction District Advisory Council and the Grand Junction District Advisory Board (see p. 228, draft RMP EIS). Copies of the draft RMP EIS were made available to the ranching community.
156	C9	The *Grand Junction Resource Area Rangeland Monitoring Plan* prescribes the study procedures that will be used to monitor livestock impacts on the riparian areas. If the current grazing systems do not meet RMP objectives and priorities for these areas, the systems could be amended. Amended systems could include the holistic management system.
157	62	Conflicts between wildlife and livestock management were addressed in the *Grand Junction Grazing Management Environmental Statement* and each allotment management plan.
158	73, 86	The *Grand Junction Grazing Management Environmental Statement* analyzed the erosion/salinity impacts associated with grazing public land. This analysis was reviewed in light of the RMP alternative impacts and found to be adequate. CEQ 1502.21 directs agencies to incorporate material into an environmental impact statement by reference when the effect is to reduce bulk *without impeding agency and public review of the action*. Such was the case. Development of or review and modification of activity plans (AMPs) are not within the scope of the RMP EIS. The RMP defines land use objectives and guidelines. Activity plans, the next step, define the manner in which these objectives and guidelines are implemented by specific resource activities to meet or conform to the RMP decisions and guidelines (see p. 44, draft RMP EIS, Livestock Management).

Table 3. Responses to Public Comments—Continued

Response No.	Commenter No.	Response
		When existing AMPs are reviewed and revised and new AMPs prepared, grazing management practices and objectives will be analyzed to ensure their consistency with RMP decisions and objectives for riparian and critical erosion areas. Where necessary, appropriate changes will then be made in AMPs and new grazing decisions or agreements developed to institute the appropriate changes in grazing use (see pp. 95, 96, 98, 100, 101, 104, 107, and 108, draft RMP EIS, Management of Emphasis Areas, Preferred Alternative, Livestock Grazing). Also, as activity plans are prepared for certain areas (i.e., watershed plan for the Grand Valley desert), review and revision of AMPs will be required. At the beginning of the planning process, the BLM, the general public, other federal agencies, state and local governments, and advisory groups identified issues and management concerns in the planning area. No significant grazing impacts or concerns were raised that were not previously addressed in the *Grand Junction Grazing Management Environmental Statement* (see p. 14, draft RMP EIS, Issues Previously Addressed). BLM is presently implementing with the permittees several types of grazing management, one of which is the holistic resource management (Savory). BLM is open to this and any new development in resource management. The use of the Savory Grazing Method (SGM) will probably be limited on BLM allotments to those where the rancher has attended the Savory school and where he/she is prepared to make the large commitment of time and effort necessary to ensure its success.
		WILD HORSES MANAGEMENT
159	A5	The wild horse herd will be kept at a level compatible with available carrying capacity of the area. Population numbers will be adjusted based on forage and range conditions. Since 1977, 85 head of horses have been removed from the range and adopted by private individuals.
160	A19, 26	The Wild Horse and Burro Act of 1971 (Public Law 92-195) defines a wild horse as all unbranded and unclaimed horses and burros on public land of the United States. The wild horses in the Book Cliffs fall under this definition, and the area was dedicated as a wild horse range.
161	62	The impact from oil and gas development in the wild horse wintering area is minimal. The significant impact is from further coal leasing in the area. Before any new leases are granted in the critical wintering area, any adverse impacts identified would have to be mitigated before any new leases are issued (see p. 45, Proposed Management Actions and Effects).
162	68	The proposed line for the expansion of the wild horse range was in error. Please see Map 13 in this document for the correct boundary. The acreage (2,380 acres) identified on Table 2-11 of the draft RMP EIS is correct.
163	68	The expansion of the wild horse range to include the Book Cliffs rims would not reduce the grazing permits below the rims because domestic livestock do not use this area.
		CULTURAL RESOURCE MANAGEMENT
164	A14	Recreation impacts on cultural resources were addressed in the draft RMP EIS, pages 157, 176, 194 and 212, Impacts section, Chapter 4. Recreation activities will be planned and conducted in a manner to reduce user conflicts to the greatest degree possible.
165	59, 84	Increased access is not necessarily a function of leasing categories. In terms of impacts on cultural resources, a no surface occupancy designation is as effective as a no lease designation in that no surface disturbance is allowed (that includes access roads). Please see the draft RMP EIS, pages 193 and 212, Chapter 4, Impacts from Locatable Minerals. All processes permissable under federal law and regulation will be used to protect significant resources. This includes 106 consultation, no surface occupancy, and other protective designations.
166	70, 75, 84	The eight areas identified for active management were selected based on the criteria presented in the RP3 documents and the Grand Junction Resource Area Cultural Resource Management Guide (draft RMP EIS, p. 46). All sites recorded on public land were analyzed, and their preservation needs were identified. This information is on file in the GJRA office (as are the RP3 publications and Grand Junction Resource Area Cultural Resource Management Guide). "Active management" is a label for a comprehensive, long-term commitment by the BLM to manage a given cultural resource. This process begins with a cultural resources management plan that outlines the steps for site protection. Special designations, physical and administrative needs and measures, public interpretation or educational uses, the need for data recovery or further recordation, monitoring, and patrol schedules are the kinds of things that are addressed in the plan. Funding commitments and priorities are also identified and work schedules are established. Sites that were not identified for active management in the draft RMP EIS will be used as part of BLM's automated data processing and data base management systems. They will receive physical protection or monitoring as funds become available.
167	70	The text has been changed (see Changes to Draft RMP EIS section in this document).
168	70	Cultural resource management has been interpreted correctly. It has not been presented to specifically mean archaeological research.

Table 3. Responses to Public Comments—Continued

Response No.	Commenter No.	Response
169	70	All data recovery or archaeological research investigations on public land require a research plan and must be conducted in a scientifically acceptable manner. Project salvage occurs when a proposed project will impact a known significant cultural resource. Mitigation of the project's impact to cultural resources is what determines when, what and how the site is investigated. This is in contrast to research where a specific question or set of questions determines where, what and how investigations should take place.
170	75	Indian Creek is slated for active management, including a cultural resources management plan. One of the purposes of the cultural resources management plan is to determine the boundaries of the site. Acreage was computed from existing site forms. Since the time of writing the draft RMP EIS, however, investigations indicate that (1) accurate mapping is needed and (2) the acreage figures will have to be expanded.
171	84	The wording "beyond the extent required by law" was added to the end of the first paragraph on page 212 (see Changes to Draft RMP EIS section of this document). See also response 166 for clarification of their question on management. We are in compliance with the 1966 National Historic Preservation Act (NHPA) as amended in 1980. There is no "E.O. 11593;" it has been incorporated into the above act. Hence, we are in compliance. In regards to ARPA, this is also consistent with NHPA. It is an act that allows for criminal and/or civil actions to proceed where archaeological resources have been damaged. The intent of the Act is to deter vandalism to archaeological properties; it has nothing to do with preservation per se.
172	84	Private land holdings prohibit implementation at this time. However, the area will be managed as if it were a district through a cultural resources management plan. This area meets the acquisition criteria discussed on page 56 of the draft RMP EIS.
		RECREATION RESOURCE MANAGEMENT
173	A6	Access requirements for designated wilderness areas would be determined through activity plans to be developed after the area management goals have been identified.
174	A7, 17	The open off-road vehicle area and no-shooting zone lie east of the branch of 27¼ Road that goes to the old town of Carpenter and would, therefore, not affect the gun range.
175	A9	Hunting regulations are not affected by wilderness designation; however, vehicle access is prohibited. Access would still be provided by most of the existing public roads along the boundary of the WSA.
176	A13, A14, 59	As stated in a letter to the Colorado Open Space Council, dated February 19, 1985, it is not appropriate to determine wild and scenic river potential in an RMP. However, the recreation inventory for the Grand Junction Resource Area indicates that the Gunnison River has attributes that could make it a candidate for study under the Wild and Scenic Rivers System. The determination of which U.S. rivers will be formally studied is made by Congress. The wilderness study process is different because Congress has directed BLM to study all public land for wilderness suitability. If the Gunnison River became a study river, the river corridor would automatically receive some protection, and the RMP could be amended as necessary to accommodate designation decisions. See also response 177.
177	A13, A16, C1, C5, C8, C11, C14, C16, 3, 7, 14, 15, 20, 27, 28, 35, 36, 39,45, 47, 53, 56, 59, 75, 79	The identification of rivers to be formally studied, recommended, or designated under the national Wild and Scenic Rivers System involves Congressional action and direction. The Colorado River through Ruby Canyon and the Dolores River downstream from Gateway are included in the *Colorado and Lower Dolores Rivers Wild and Scenic River Study, 1983*. In this study, the portions of both rivers which lie in Colorado were recommended suitable for scenic river designation. This wild and scenic river study was forwarded to Congress in April 1985. The action of forwarding this study to Congress gives the affected river corridors a three-year period of partial protection intended to provide time for Congressional evaluation and action on the study. Once Congress designates a river under the National Wild and Scenic Rivers System, the appropriate land management is given one year to prepare a river management plan addressing wild and scenic river management criteria. The RMP outlines river corridor management that would occur on the Colorado, Dolores, and Gunnison Rivers unless some future Congressional decision directs the BLM to manage otherwise. Several changes relating to river management have been made in the final RMP (see Changes to Draft RMP EIS section in this document). Under the Preferred Alternative, the Ruby Canyon corridor would not be managed according to scenic river designation criteria as recommended in the draft RMP EIS. The other recommendations made for these rivers would remain the same, however, with one exception: the protective management on the Dolores River would extend for the entire length of the river within the Grand Junction Resource Area. The full minerals withdrawal within the Dolores River corridor, as suggested by numerous public comments, will not be pursued. The Dolores River shoreline itself is not as spectacular as the Ruby Canyon shoreline. There is more private land, the potential to use natural vegetative screening is greater, and recreational use levels and demand are much lower.

Table 3. Responses to Public Comments—Continued

Response No.	Commenter No.	Response
		Another RMP change involves river permits. The need for requiring private boaters to obtain permits would be determined during the development of activity plans for the Dolores, Gunnison, and Colorado Rivers.
178	C10	Under the Preferred Alternative, the canyons in the Bang's Canyon/Northeast Creek area would be leased for oil and gas with a no surface occupancy (NSO) stipulation. The bench country in between the canyons would be leased with a scenic and natural values (SNV) stipulation. These leasing categories give the area partial protection commensurate with the overall management goals for the area.
179	C10	Under the Preferred Alternative, the South Shale Ridge area would be designated as an area where vehicle travel is limited to designated roads. In addition, public vehicle access would not be permitted on any new road constructed for industrial purposes (e.g., oil and gas exploration). Any new road would also be constructed to minimize disturbance of the scenic badlands sculpturing found throughout the area.
180	12, 20, 35, 36, 45, 47, 53, 59	The management recommended for the cliffs of Unaweep Canyon includes all public land on the North Fork of the West Creek drainage (sometimes called Northwest Creek). This management includes visual resource management (VRM) Class II designation, a no surface occupancy (NSO) oil and gas lease stipulation, and a limited to existing roads and trails off-road vehicle (ORV) designation. The North Fork would also be included within the Gateway Intensive Recreation Management Area for which a more detailed recreation area management plan would be developed in the future. This management plan would propose semi-primitive non-motorized management for the North Fork drainage.
181	15	Under the Preferred Alternative, no actions would be taken to increase livestock use within or access to the river corridors. Existing livestock use levels are low.
182	51	The public access issue at the Jerry Creek Reservoirs was not specifically addressed in the RMP because a right-of-way has been issued to Ute Water Conservancy District to authorize these reservoirs. The right-of-way of March 26, 1981, does include a provision that "The United States retains the right to review this right-of-way grant commencing on the fifth year from the date of the grant and every five years thereafter, to consider whether or not there shall be restricted public access to and recreational use of the Jerry Creek Reservoir Number Two. This public use shall be dependent upon the BLM receiving adequate funding to monitor and control such public use in accordance with the Jerry Creek Number Two Recreation Management Plan developed by the BLM with input from the holder and the public..."
183	51, 62	The no-shooting zones proposed in the Preferred Alternative were developed in response to numerous public comments provided over an extended period of time. Heavy public use and indiscriminate shooting are not compatible recreational activities. Public and other agency comments on the proposed no-shooting zones are being solicited through the RMP process. Following completion of the RMP, the BLM would approach the appropriate county and state agencies, including the Colorado Division of Wildlife, to request their formal concurrence and assistance with designation and enforcement of no-shooting zones on BLM land.
184	51	The right-of-way grants for these two areas are different because of different circumstances involved when the grants were issued (see response 182 concerning the Jerry Creek Reservoir grant). At the time the Cabin Reservoir right-of-way was issued, it was determined that the reservoir's small size and close proximity to Grand Junction could lead to difficulty in management of public use. For your information, Cabin Reservoir is being used by the Colorado Division of Wildlife to raise special brood fish for their hatchery program.
185	55	Some protective types of public land management are proposed for various areas in the Book Cliffs (e.g., no surface occupancy lease stipulations for oil and gas exploration on steep slopes, visual resource Class III management in some scenic areas, maintenance of semi-primitive motorized recreation opportunities in a few places). Existing oil and gas leases cover most of the Book Cliffs, limiting opportunity for the more pristine forms of protection. See also response 177 concerning Dolores River management.
186	59	The semi-primitive non-motorized setting in the Hunter/Garvey Canyon area would be maintained where it presently exists. All existing roads and trails would remain open for vehicle use. Any proposal for a road through the Hunter Canyon area to the top of the Roan Cliffs would be denied. New roads (e.g., oil and gas exploration roads) would be authorized on the benches of the Hunter/Garvey Canyon area but not within the canyons or on the cliffs themselves (40 percent slopes or greater). With these constraints, there would exist a semi-primitive non-motorized management zone from the foot of the Book Cliffs to the top of the Roan Cliffs. This decision would be subject to change based on possible changes in policy governing development of existing oil and gas leases. Under the Preferred Alternative the Hunter Canyon area would be open to coal leasing without restrictions on surface facilities.
187	75	The South Shale Ridge area would receive some protective management through the scenic and natural values (SNV) oil and gas leasing stipulation, VRM Class III management (the more scenic badlands features would be avoided), recreation opportunity spectrum (ROS) management as a semi-primitive motorized zone, off-road vehicle designation of "limited to designated roads," and no new roads designated for public use. South Shale Ridge was analyzed for possible area of critical environmental concern (ACEC) designation under the Protection Alternative. See also responses 179, 198, and 199.

Table 3. Responses to Public Comments—Continued

Response No.	Commenter No.	Response
		VISUAL RESOURCE MANAGEMENT
188	29	Under the Preferred Alternative both Unaweep and the Dolores River Canyons would be managed with an emphasis on protection of visual, recreational, and environmental values. BLM would be willing to consider some form of cooperative management agreement with Mesa County and the U.S. Forest Service for this area. See also response 243.
189	56	Under BLM policy (8400) the VRM Class I designation is generally used only in special designation areas where strict preservation of natural landscape character is appropriate and necessary to meet special are management goals (e.g., wilderness areas, wild and scenic river corridors, some outstanding natural areas). Not all wilderness study areas were recommended for wilderness designation in the Preferred Alternative.
190	59	The VRM Class III designation along the bottom of Unaweep Canyon is intended to accommodate possible activity on the adjacent private land that dominates the valley floor and because the more level nature of the bottom land makes it suitable for a variety of potential land uses. See also response 188.
		OFF-ROAD VEHICLE MANAGEMENT
191	A15, 92	The draft RMP EIS has been changed to clarify how proposed competitive off-road vehicle (ORV) events would be handled outside of designated open areas (see Changes to Draft RMP EIS section in this document). To summarize, proposals to hold events outside of established open areas would be considered on an individual basis. The intent of permit processing would be to keep most of an event on existing roads and trails (most washes are existing trails) with possibly up to 25 percent of total race mileage off of existing trails (cross-country). The areas where cross-country use might be authorized are within the more rugged, relatively barren zones of exposed mancos shale that are scattered throughout the Grand Valley desert. Competitive events would be monitored to ensure compliance with permit requirements and to prevent excessive cross-country use from damaging soil structure in any one area. Competitive use would not be allowed to occur repeatedly in any one area outside of established open areas. The expenses and procedure involved in the special recreation permitting process (which includes permits for competitive ORV events) are established by Bureau-wide program policy and, therefore, are not subject to change through an RMP decision. Approval of all proposed race mileage outside the ORV open area would require a field check by BLM personnel. See also responses 192 and 194.
192	A15, 11, 23	Two additional open areas have been added for ORV use—a 600-acre area on 25 Road and a 400-acre area on 18 Road, both north of the Highline Canal in the Grand Valley desert (see Changes to Draft RMP EIS section in this document). These two areas, combined with the 10,240-acre open area (between 27¼ Road and Mount Garfield) comprise a relatively large area available for casual and competitive ORV use when compared to established open areas in other parts of the western U.S. All three of the open areas respond to the needs and convenience of the casual, noncompetitive ORV demand in the Grand Junction Resource Area. All three would be designated as no-shooting zones. In most areas where off-road vehicle use would result in significant conflict with other resources, vehicle use would be allowed for on existing roads and trails only. General cross-country travel would not be allowed. Because of this, most existing roads and trails in the Grand Junction Resource Area would remain available for vehicle travel. See also response 191.
193	C9	It is Bureau-wide policy that the ORV designation map "will be the primary means of informing users of ORV designations" (BLM Manual 8372.06I). However, signs will be placed in some areas based on priorities developed in the ORV implementation plan and on availability of funding to implement the plan.
194	29	The areas proposed for open designation (see responses 191 and 192) are all within historical public ORV use areas. Designation of a smaller acreage in the open category could create hazardous crowding of casual and competitive vehicle operators, would be difficult to enforce, and would not address public demand. Most public land contains existing grazing allotments. The remaining public land is unsuitable for ORV use. Therefore, allowing ORV use only outside the grazing areas as you suggest would leave no land available for ORV use. ORV use in proposed open areas should not affect grazing because of the relatively large size of the areas and the fact that terrain attractive to ORV users is not generally attractive to livestock (most available forage is on the more level ground). Licensing of off-road vehicles is a state function. BLM presently issues special recreation permits for competitive and commercial ORV events but does not authorize general permitting/licensing of motor vehicles themselves.
195	57	An ORV implementation plan will be written during the year following approval of the RMP. This plan will cover the details involved in proposed sign locations and possible need to identify public land boundaries. Your comment will be considered during implementation plan preparation.
196	62	Skipper's Island and other tracts along the Gunnison and Colorado Rivers that were identified for disposal have been placed in a cooperative management agreement category (see Changes to Draft RMP EIS section in this document under Land Tenure Adjustments). Pending development of cooperative management agreements, which may change the ORV designation status, these tracts will be designated as open to ORV use. See also response 242.

Table 3. Responses to Public Comments—Continued

Response No.	Commenter No.	Response
197	68	Special uses and situations can be accommodated under the ORV designation and management policy. Where noncompliance with ORV designations must occur on a regular basis, such as for livestock management purposes, written permission may be granted by the area manager.
198	73	The rationale for tradeoffs involving competing land use proposals was always made based on analysis of public concerns expressed through the RMP issue identification process, projected effects on resource values, demands for resource use, and various national policies. The intensity of analysis documented in the draft RMP EIS reflects the magnitude of public concern on resource impact anticipated from the RMP proposals and the likelihood of impacts.
199	73	It is understood that new oil and gas roads usually open up former remote areas to public vehicular access and possibly cross-country ORV travel into new areas. For this reason, public vehicular access would not be permitted on new oil and gas roads in several sensitive areas—Little Book Cliff Wild Horse Range, Demaree Canyon, south slopes of the Battlement Mesa, South Shale Ridge, and the semi-primitive non-motorized zone in Hunter/Garvey Canyon. In addition, the ORV designations include a number of sensitive areas where public vehicle travel would be limited to existing roads and trails and limited or prohibited on a seasonal basis (primarily to protect wildlife winter range). Although oil and gas exploration activities are generally not affected by ORV designations, the ORV designations do provide some protection from public vehicle related resource damage.
		WILDERNESS MANAGEMENT
200	A1, A2, A8, A17	BLM is aware of the historical rockhounding use in this area. However, of the 60 WSAs in Colorado, the Black Ridge Canyons WSAs are considered to be within the top two or three most outstanding BLM wilderness study areas. The Black Ridge Canyons WSAs are being recommended suitable for wilderness because of their high quality wilderness characteristics and their significance as an addition to the *National Wilderness Preservation System*. Wilderness management allows rockhounding in a wilderness area, if consistent with preservation of wilderness character and values, but prohibits motorized access. Therefore, motorized rockhounding activities would be displaced from the Black Ridge WSAs into other areas of the region. Based on the availability of opportunities elsewhere in the region, displacement was considered a minor adverse impact over the long term. Wilderness designation is considered a major long-term beneficial impact to the National Wilderness Preservation System. Closure of the WSAs to motorized rockhounding would also help prevent unauthorized removal of paleontological and archaeological resources found in the areas. These resources may not be removed without BLM permits. The proximity of the Black Ridge area to Grand Junction, the largest urban area on Colorado's western slope, makes it attractive not only to Grand Junction rockhounds but also to wilderness users. BLM's *Wilderness Study Policy* emphasizes giving greater importance to potential wilderness areas in close proximity to population centers.
201	A3	Motorized rockhounding and hunting opportunities are available elsewhere in the region. See also response 200.
202	A6, 66	BLM is currently monitoring all activities in this WSA in accordance with its *Interim Management Policy for Lands Under Wilderness Review*. New vehicle tracks in the WSA have not yet affected the unit's naturalness except in the mouth of Big Dominguez Canyon. Impacts from motorcycle use in that area may require an emergency ORV closure in the near future. BLM has been mandated to study its land for wilderness. If the Dominguez Canyon WSA is designated wilderness, it will be managed in accordance with BLM's *Wilderness Management Policy*. Specific law enforcement needs and other problems will be addressed in the activity management plan prepared following Congressional action. See also response 218.
203	A13, A14, A16, C1, C2, C10, C11, C14, C16, 3, 9, 14, 17, 20, 27, 28, 35, 36, 38, 39, 41, 45, 47, 53, 55, 56, 75	The Preferred Alternative suitability recommendations for Dominguez Canyon have been changed (see Changes to Draft RMP EIS section in this document). A total of 17,263 acres, primarily along the Gunnison River and Escalante Creek, formerly recommended as nonsuitable are now recommended as suitable. The new recommendations are 2,232 acres nonsuitable and 73,568 acres suitable.

Table 3. Responses to Public Comments—Continued

Response No.	Commenter No.	Response
		The nonsuitable acres are composed of 1,192 acres above the unit's western canyons rims, 1,000 acres in the Open Draw/Palmer Gulch area, and 40 acres for other minor boundary adjustments. The 1,192 acres above the unit's western rim were recommended nonsuitable to improve manageability by reducing vehicle and firewood trespass from the adjacent roads and chainings. These boundary adjustments also helped to minimize forest management conflicts. The 1,000 acres in the Open Draw/Palmer Gulch area were recommended as nonsuitable to create a more definitive topographic boundary (which minimizes potential vehicle conflicts), to remove imprints of man, and to provide for future trailhead development. The other 40 acres were recommended nonsuitable to make the unit easier to manage.
204	A13, A14, C2, 9, 14, 25, 27, 35, 39, 47, 59, 84	The primary reason for the nonsuitability recommendations in these WSAs is potential loss of high mineral values. The Demaree Canyon and Little Book Cliffs WSAs contain KGSs, are considered prospectively valuable for oil and gas, have high development potential for oil and gas, and contain known coal deposits. BLM estimates that the Demaree Canyon WSA contains 125.3 million short tons of coal and 21,050 acres of high potential oil and gas lands. The Little Book Cliffs WSA contains 349 million short tons of coal and 26,525 acres of high potential oil and gas lands. Nondevelopment of these coal and oil/gas reserves would be a significant loss of rental income, royalty revenues and a foregoing of potential reserves. Another reason for the nonsuitability recommendations is the presence of leases issued prior to the passage of the *Federal Land Policy and Management Act*. These pre-FLPMA leases on 92 percent of the Demaree Canyon WSA and 85 percent of the Little Book Cliffs WSA adversely affect BLM's ability to manage these areas as wilderness in the long term. Because of the leases' widespread distribution, boundaries cannot be adjusted to ensure maintenance of wilderness values; therefore, these WSAs are not manageable for wilderness. BLM's *Wilderness Management Policy* states that BLM must be reasonably certain that the areas recommended for wilderness can be managed as wilderness over the long term based on present knowledge of the resources and private rights in the area. As the actual expiration of leases and contraction of units cannot be predicted, their effect on manageability cannot be predicted.
205	A14, A16, B1, C10, C11, C12, C14, 14, 25, 27, 28, 30, 35, 38, 39, 40, 45, 53, 56, 59, 65, 75	BLM acknowledges the significant scenic, geologic and natural values present in The Palisade WSA. The unit's ecological diversity and geologic history were major considerations in designating a part of the WSA as an outstanding natural area (ONA) in the Grand Junction Draft RMP EIS. Based on strong public support for protection of The Palisade's values (through wilderness designation) and BLM's reevaluation of the geographic extent of these values in The Palisade WSA, the ONA boundaries have been expanded from 1,920 acres to 19,178 acres (see Changes to Draft RMP EIS section in this document). The expanded boundaries generally follow those identified in the Wilderness Manageability Alternative, Appendix I, Grand Junction Draft RMP EIS. The ONA designation, as described in *Code of Federal Regulations* 2071, places primary emphasis on protection of areas with outstanding scenic splendor, natural wonder, and scientific importance. ONAs are relatively undisturbed areas, representative of rare botanical, geological or zoological characteristics of principal interest for scientific and research purposes. The Palisade WSA meets these ONA criteria. Primitive recreation use of the ONA would be allowed consistent with protection of the unit's values and existing legal access. The Palisade WSA was considered nonsuitable for wilderness based on marginal manageability—primarily trespass related to recreational use, a general lack of public support in the Gateway area for wilderness, and conflicts with long-time established uses in parts of the WSA. This WSA has very limited legal access along its southeastern side (along Colorado High 141) and none from its northern side, except in the northwest corner. There is no legal access into the North Fork of West Creek or Fish Creek. Both are popular areas that provide physical access to the north rim. It is impossible to hike the north rim, a major recreation attraction of the WSA, without trespassing over the majority of its 12-mile distance. The primary legal access is along the unit's western boundary. The unit's configuration and steep topography limit recreationists' movement within the area and create trespass problems. Keeping recreationists restricted to trail rights-of-way, especially on the rim, was considered a big problem. Steep, and sometimes vertical slopes, funnel recreationists into more accessible areas, which are oftentimes private land. Most of this unit has steep sideslopes with no large core area. This begins to restrict freedom of movement in the area. The Wilderness Manageability Alternative, Appendix I, draft RMP EIS, identified the need for acquisition of three rights-of-way to try to remedy the trespass problem and provide for primitive recreation. These rights-of-way were not included as part of the expanded outstanding natural area (ONA) recommendation because, unlike wilderness designation, providing opportunities for recreation is not a primary management goal of the ONA designation.

Table 3. Responses to Public Comments—Continued

Response No.	Commenter No.	Response
		Established off-road vehicle (ORV) use in Bull Draw and along the washes on the western boundary creates user and resource conflicts. Although ORV opportunities are common in the Gateway area, closing such large areas to ORV use by blocking drainages or digging trenches was not considered practical over the long term. ORVs seem to be able to maneuver around such barriers. Boundary adjustments as part of the ONA would minimize these conflicts and still protect the WSAs scenic, geologic and natural values. A 797-acre area on the eastern boundary identified for forest management and a 160-acre pre-FLPMA oil and gas lease on the northern boundary were also excluded from the ONA. Both of these adjustments to resolve resource conflicts are considered minor. The 37-acre Unaweep Seep Research Natural Area was also excluded from the ONA to prevent duplication of management designations. The ONA designation would protect The Palisade WSA's scenic, geologic and natural values, minimize management problems related to recreation use, and resolve conflicts with local established uses. The revised ONA (19,178 acres) would continue to have low public use because of access limitations. Grazing would continue in the ONA. The ONA would also be open to mineral location (low potential) and mineral leasing with no surface occupancy. The rocky spine called "The Palisade" would be managed as VRM Class I, and the remainder of the ONA would be managed as VRM Class II.
206	A14	See draft RMP EIS, page 270. See also response 204.
207	B1	The 1964 *Wilderness Act* emphasizes the establishment of wilderness areas for the protection of natural ecosystems having the wilderness characteristics outlined in Section 2C of the Act. Recreational use of designated wilderness is allowed consistent with the protection of wilderness values.
208	C2, C8, 13, 59, 75	The cherry-stemmed road to the arches was recommended to facilitate recreational day use in the Rattlesnake Canyon/Pollock Canyon area. This area has had a lot of historical motorized access, and it was decided to leave a portion of this access open. The road has been blocked more than a half mile from the Rattlesnake Canyon Arches and does not directly impact the arches. Although this road and trailhead do present some management problems, BLM believes the wilderness values can still be maintained while enhancing recreation use of the unit.
209	C3	A 160-acre pre-FLPMA oil and gas lease in The Palisade WSA was not an issue in recommending the area nonsuitable for wilderness because the boundary can be easily adjusted to exclude the lease. See also responses 204 and 205.
210	C8	The rationale for dropping areas during the inventory is provided in BLM's 1980 publication, *Final Wilderness Study Areas*. Also, BLM is providing special management to protect primitive values in Bang's, Rough, Hunter and Garvey Canyons. See also responses 26 and 205.
211	C8	Bang's Canyon, Rough Canyon, South Shale Ridge, Hunter Canyon and Garvey Canyon did not qualify as wilderness study areas (WSAs) as documented in the November 1980 Final Wilderness Study Areas because they were considered to lack outstanding opportunities for primitive and unconfined recreation and/or outstanding opportunities for solitude. The Grand Junction Draft RMP EIS does state in the Preferred Alternative that these areas would be managed to protect their primitive values. See also responses 178, 186, and 187. In reference to the comment on South Shale Ridge, see response 205.
212	C10	The nonsuitability recommendation for the Demaree Canyon and Little Book Cliffs WSAs is based primarily on the mineral values in those areas. See also response 204.
213	C11, 30	The western boundary of Sewemup Mesa WSA was modified to improve manageability (see p. 403 of the draft RMP EIS). Expansion of this boundary onto USFS land would require Congressional action. No authority presently exists to study the U.S. Forest Service land for wilderness.
214	C14	The primary reason the Book Cliffs area was not recommended as suitable for wilderness is its high mineral value (see also response 204). Exchanging leases is not considered workable because the determination of wilderness manageability according to the BLM's *Wilderness Study Policy* must be based on the present situation and the high value of the existing leases would make exchange for comparable leases very difficult.
215	2	All the wilderness areas were evaluated for mineral potential by either the U.S. Geological Survey or the BLM.
216	2	After eight years of debate, Congress passed the *Wilderness Act* in 1964. In 1976, Congress passed the *Federal Land Policy and Management Act*. It mandated that BLM review all public land it administers and report on the land's suitability for wilderness. Areas designated as wilderness are set aside in perpetuity to protect the values identified in Section 2C of the *Wilderness Act*. Once designated, only Congress can modify the wilderness designation.
217	3, 7, 12, 18, 20, 36	See responses 204 and 205.

Table 3. Responses to Public Comments—Continued

Response No.	Commenter No.	Response
218	8	Most of the problems you have identified in the Dominguez Canyon WSA are not unique to this area and occur throughout the Grand Junction District. Some problems have little relationship to wilderness and its use. Acts of vandalism and theft on private land in many cases are unrelated to wilderness recreation use. Instead of creating more problems, BLM believes wilderness designation would actually reduce conflicts with grazing operators and adjacent private property owners through increased management authority and policing. It is anticipated that a BLM wilderness ranger with law enforcement capability would help patrol this area. The ranger would help enforce wilderness management recommendations in this area once it is designated as wilderness. Wilderness research indicates that a newly designated wilderness area does not experience significant changes in recreational use. Some increase would be expected to occur after designation for the first two or three years, but this would then level off. Also, designation would close the area to off-road vehicles. If the Dominguez Canyon WSA were designated wilderness, a wilderness management activity plan would be prepared. It would address specifically how the 73,568 acre unit would be managed to preserve wilderness while allowing various other uses. It would also identify specific law enforcement needs. Access would be an integral component of this plan. The Bridgeport area would be evaluated for access in the wilderness management plan, including the need for a new bridge. Impacts to private property and mitigation of these impacts would also be addressed. An interim management plan for the Dominguez Canyon WSA will be prepared during 1986 to address how to best manage, on an interim basis, access, law enforcement, off-road vehicles, fire rehabilitation, and mining until such time as Congress acts on the wilderness proposal. These actions will be addressed within the framework of BLM's *Interim Management Policy and Guidelines for Lands Under Wilderness Review*. BLM acknowledges that the Bridgeport bridge is a private bridge located on public land. BLM has blocked vehicle traffic at Deer Creek and the Gunnison River to lessen impacts on the bridge and the ranch in the Bridgeport area. Following an environmental analysis by BLM and right-of-way agreement, the public has been provided walking access across the bridge. Livestock operators and mining operators have been allowed vehicle access to the bridge but must negotiate crossing the bridge with the owner. Although there are still problems at the Bridgeport area, BLM is trying to minimize people related problems. The BLM and the bridge owners are currently attempting to resolve the question of liability on the bridge.
219	15	Granite Creek did not qualify for further wilderness study as documented in BLM 1980 publication, Final Wilderness Study Areas. See also responses 204 and 205.
220	19	See response 218.
221	24	Currently, the Bureau of Reclamation withdrawals are located in the Dominguez Canyon WSA. See also response 224.
222	25, 27 53, 39	The lack of outstanding opportunities for primitive and unconfined recreation in the Demaree Canyon WSA (does possess outstanding opportunities for solitude) was documented in the 1980 BLM publication, *Final Wilderness Study Areas*. Scenery outside a WSA cannot qualify it as having outstanding primitive recreation opportunities. BLM personnel have hiked throughout the unit. Blooming cactus, interesting water courses and deep gorges add value to the area but were not considered to provide outstanding primitive recreation opportunities. In reference to the future of pre-FLPMA leases, see response 204. The wildlife in the unit was not considered to be a special feature since the species present are common in the region.
223	28	See response 204.
224	29, 43	The designation of the Dominguez Canyon WSA as wilderness and the development of the Dominguez Canyon Dam both depend on Congressional actions and appropriations. Congress would have to determine if the existing withdrawals are compatible with wilderness determination. See page 360 of Appendix I.
225	53	This road provides access to public land south of the Black Ridge Canyons WSA and cannot be closed. It provides access to ranchers, BLM field personnel, and recreationists, including hunters. Additionally, it provides motorized access to the Rattlesnake Canyon area and the southern boundary of Black Ridge Canyons WSA. See also response 206.
226	53	BLM acknowledges the high wilderness value of the Little Book Cliffs WSA and the Little Book Cliffs Wild Horse Range. However, mineral values (oil and gas and coal) preclude recommending the area for wilderness designation. Wilderness designation would also increase the administrative costs of the wild horse range. See also response 204.
227	56	The outstanding opportunity criterion in the BLM Wilderness Inventory Handbook is very subjective. However, during the inventory phase, BLM determined that scenery outside a WSA cannot qualify it as having outstanding primitive recreation. It is agreed that this scenery adds to the sightseeing opportunities in a WSA, but the outstandingness of a primitive and unconfined recreation experience must be based on the resources inside the WSA. See also responses 56-11 and 204.
228	56	The 222 acres of pre-FLPMA coal leases are only a very small part of the wilderness manageability problem in this WSA. See also responses to 204 and 26.
229	57	More specific language has been added (see Changes to Draft RMP EIS section in this document).

Table 3. Responses to Public Comments—Continued

Response No.	Commenter No.	Response
230	59	These areas did not qualify as wilderness as documented in the 1980 BLM publication, *Final Wilderness Study Areas*. When some of these areas were appealed, the Interior Board of Land Appeals affirmed BLM's inventory decisions. Areas not qualifying as WSAs have been recognized by BLM as needing special management to protect primitive values. Wilderness suitability recommendations must be based on areas that have qualified as wilderness study areas.
231	59	These species do occur in the WSA and have been added to the list of special features listed on page 355 of the draft RMP EIS (see Changes to Draft RMP EIS section in this document).
232	59, 75	In the proposed plan and final RMP EIS, only 1,192 acres are deleted in part for pinyon-juniper management, which is the area outside a modified boundary that improves manageability on the western edge of the unit. These 1,192 acres are above the rim of the canyons and have chainings and roaded areas adjacent to them. Moving the boundary to the rim in these areas creates a more manageable unit by helping to minimize conflicts with firewood cutting and ORV travel. Forest management would be allowed above this rim boundary. A total of 1,450 acres originally recommended for forest management in two areas below the rim have been added back into the proposed Dominguez Canyon Wilderness (see Changes to Draft RMP EIS section in this document).
233	59	The numbered acreage of pre-FLPMA leases is included. Specific lease information was not included in the draft RMP EIS because it was not considered relevant to analysis of the alternatives. See also response 204.
234	59	When the public asks about access to wilderness in the future, BLM will direct them to a map showing legal and physical access. Some trailheads are logical access points to the wilderness. Others are established to minimize trespass and to manage recreational use of wilderness areas. Information on primitive recreation opportunities other than wilderness will also be provided to the public as requested. See also response 235.
235	59	The trailheads in Sinbad Valley and for Knowle's Canyon were proposed to provide for legal access into the respective WSAs. Specifics of trailhead development would be addressed in the wilderness activity plan. The southwestern boundary of Black Ridge Canyons West WSA was expanded to improve manageability which included providing a legal access route to Knowle's Canyon. The purpose of the trailheads is not to promote use but rather to control or direct use for a variety of management purposes.
236	59	The projected density and success ratio of new wells (see Oil and Gas Development Projections, p. 118, draft RMP EIS) and the assumed amount of surface disturbance for each activity (see Oil and Gas Assumptions, p. 145) was applied to the acreage within each WSA. The exact location of the projected development is not known and cannot be reasonably projected.
237	62	Following wilderness designation, a wilderness management plan would specify the instances and places in which administrative use of mechanized equipment, mechanical transport or aircraft is the minimum necessary to protect and administer the wilderness resources. Where approved, that equipment which is the minimum necessary to accomplish the task with the least lasting and damaging impact on the wilderness resource would be selected. Objectives for the management of wildlife habitat are normally compatible with objectives for maintaining general wilderness character or careful planning usually can make them so. Where incompatible, the requirement for maintenance of wilderness would be overriding.
238	84	See responses 204 and 205.
239	86	No. The final wilderness study report is scheduled to be published in late 1986 or early 1987.
		SPECIAL MANAGEMENT AREAS MANAGEMENT
240	C10, 22	The draft RMP EIS has been changed (see Changes to Draft RMP EIS section in this document). All areas recommended for ONA or RNA designation in the Draft RMP EIS Preferred Alternative will have been also recommended for ACEC designation. Management direction for these areas would not change, however. See Text Changes, Special Management Areas. See also response 111.
241	22	Areas considered for special management area designations are described in the draft RMP EIS, Chapter 3, Affected Environment. Management guidelines for these areas are described in Chapter 2, Management of Emphasis Areas.
		LAND TENURE ADJUSTMENTS
242	A12, A18, 24, 29, 51, 59, 62	The text has been changed (see changes to Draft RMP EIS section in this document). Lands along the Gunnison and Colorado Rivers that were identified for disposal have been placed in a cooperative management agreement (CMA) category. Tract 416 has been placed in a retention category because it is within the Colorado Scenic River Study Area (see Changes to Draft RMP EIS section, Map Changes, in this document).
243	A13, 56, 59, C5, 29 59	The text has been changed. Tracts 420, 421, 422, 423 and 424 have been placed in a retention category (see Changes to Draft RMP EIS section, Map Changes, in this document).

Table 3. Responses to Public Comments—Continued

Response No.	Commenter No.	Response
		BLM is willing to participate in the special study of Unaweep Canyon as proposed by Mesa County. BLM would be willing to consider a cooperative management agreement with the USFS and/or Mesa County concerning these tracts. Tract 419 is a small, isolated tract that will continue to be recommended for disposal.
244	A13, 56, 59	Tract 429 and the portion of Tract 427 adjacent to the national forest have been placed in a retention category (see Changes to Draft RMP EIS section, Map Changes, in this document). Tract 428 and the remainder of Tract 427 will continue to be recommended for disposal.
245	C9, 29, 56, 59	Tract 304 has been placed in a cooperative management agreement (CMA) category (see Changes to Draft RMP EIS section in this document). The Colorado National Monument has indicated that they are willing to manage this 80-acre tract under a CMA. This tract contains the Liberty Cap trailhead and parking area. Tracts 301 and 305 will continue to be recommended for disposal. Although each of these tracts has one common corner with Colorado National Monument (CNM) land, this does not provide legal access to CNM. CNM has not indicated any interest in managing these tracts. If these tracts are transferred or sold, then future development should be controlled by Mesa County zoning restrictions.
246	C9, 29, 59	Tract 201 has been modified by making the portion adjacent to the Gunnison River a separate tract called 201-CMA. Tract 201-CMA has been placed in a cooperative management agreement category (see Changes to Draft RMP EIS section, Map Changes, in this document). The majority of Tract 201 will continue to be recommended for disposal. Any tracts sold or exchanged would require appropriate action by Mesa County for zoning changes where necessary. BLM would not address the suggested limitations in the form of patent restrictions. This RMP is a 10 to 20 year plan.
247	C10	The emphasis will be on exchanges as stated on pages 8 and 55 of the draft RMP EIS.
248	C10, 56, 59	Tract 24 has been placed in a retention category (see Changes to Draft RMP EIS section, Map Changes, in this document). Tracts 17, 18 and 31 will continue to be recommended for disposal. However, the tracts could be considered for cooperative management or acquisition by appropriate agencies, local governments or environmental groups that are willing to protect these tracts. The U.S. Forest Service has not indicated any interest in managing these tracts. Their only concern about disposal is that any existing public access roads be reserved in patents. BLM will reserve existing public access in patents.
249	16	Please refer to the draft RMP EIS, page 55, Land Tenure Adjustments, where the emphasis on land exchange is stated again. Pages 105 and 106 pertain to management of the potential disposal tracts prior to a final decision on transfer.
250	16	It is not within the scope of this plan to address the disposal of public land to any specific company or individual. Some of the disposal tracts were identified through public scoping comments both by companies and individuals.
251	16	The disposal of any federal mineral estate under private surface land will comply with Section 209 of the *Federal Land Policy and Management Act* of 1976 and the regulations in 43 CFR 2720. Where there are known mineral values, the valuable minerals are reserved to the U.S. Government. The regulations in 43 CFR 2720.0-2 state: "The objective is to allow consolidation of surface and subsurface or mineral ownership where there are no known mineral values or in those instances where the reservation interferes with or precludes appropriate nonmineral development and such development is a more beneficial use of the land than the mineral development."
252	16	The text and map have been corrected by adding 27.64 acres to Tract 150 (see Changes to Draft RMP EIS section, Map Changes, in this document).
253	16	The acquisition criteria on page 56 will be used to evaluate private lands proposed in exchange proposals. Exchange proposals will be processed in accordance with 43 CFR 2200.
254	16	An activity plan will be prepared to guide land tenure adjustments. Exchange proposals will be evaluated using the acquisition criteria on page 56.
255	17	See responses 242 and 243.
256	22, 40, 44, 51, 62, 73	Skipper's Island has been placed in a cooperative management agreement (CMA) category (see Changes to Draft RMP EIS section in this document). Skipper's Island will not be identified as an area of critical environmental concern.
257	23	Legal access is a factor we consider; however, BLM uses administrative access to manage resources that may benefit the public even though there is no legal public access.
258	24	The Bureau of Reclamation lands were not included because this plan addresses resources on public land administered by the BLM.
259	24	The additional statements you requested have been modified and incorporated in the Implementation section on page 56 (see Changes to Draft RMP EIS section in this document).
260	29	These tracts will continue to be recommended for disposal because they are small isolated tracts. BLM would be willing to work with any of these suggested agencies that are interested in the acquisition of any of these tracts. Flood plains have not been delineated for many public lands. Further analysis will be made through site-specific environmental assessments. If the tracts are transferred or sold, then future development should be controlled by Mesa County zoning restrictions.

Table 3. Responses to Public Comments—Continued

Response No.	Commenter No.	Response
261	29	Tract 13 has been placed in a retention category; however, the land could be managed under a cooperative management agreement with the Colorado State Parks and Recreation Department or another appropriate agency or group (see Changes to Draft RMP EIS section, Map Changes, in this document).
262	37	These items were considered when the disposal criteria were being established.
263	37, 44	The criteria for consolidation of retention and disposal of public land are shown on pages 19 and 20 of the draft RMP EIS. Page 21 describes the criteria used for the Preferred Alternative. Appendix A (pages 235 and 236) discusses the formulation of the alternatives. Page 56 has a brief description of the implementation of the final plan recommendations. Page 56 also contains the acquisition criteria that will be used to identify suitable private lands for acquisition.
264	37	Yes. It means that a determination would have to be made that disposal of the tracts of land would be in the interest of the public.
265	37	Yes, these assumptions are correct.
266	37	The land tenure adjustment recommendations will be recommendations until a site specific environmental assessment and land report are completed. Upon completion of these reports, a management decision will be made for either retention or disposal of the land. See also response 263.
267	37	Tables A-1 and A-2 pertain to public land resources, not to private land. Table 2-18 on page 56 quantifies some potential acquisition tracts. The acquisition criteria will be used to evaluate other private lands that are suitable for acquisition through exchange.
268	37	After reconsidering the subject parcels, Parcel C, which is very small, has been recommended for disposal (see Changes to Draft RMP EIS section in this document). Parcel C will be identified as Tract No. 139. Parcels F and H will continue to be in the retention category because they are located within potential right-of-way corridors for oil shale development. The Preferred Alternative was developed as described on page 236.
269	51	See response 243 (Tracts 420, 421, 422, 423 and 424), response 244 (Tracts 427 and 429), and response 248 (Tracts 17, 18, 24 and 31).
270	51	The text has been changed (see Changes to Draft RMP EIS section in this document). Tracts 216 and 217 are small isolated tracts that will continue to be recommended for disposal. Tract 430 will continue to be recommended for disposal in order to try to resolve an occupancy situation. See also response 242 (Tracts 160, 161, 209, 414, 415, 416, 418, 431 and 433), response 246 (Tract 201), and response 278 (Tract 150).
271	51	The Bureau of Reclamation is considered an appropriate agency under the cooperative management agreement category (see Changes to Draft RMP EIS section in this document).
272	51	As indicated in the Implementation section on page 56 of the draft RMP EIS, the disposal tracts would undergo further screening through environmental assessments and land reports. Tracts within areas that require threatened and endangered species clearances would be surveyed for the presence of those species. The results of the survey would be analyzed in an environmental assessment.
273	51, 62	Criteria 17 is one consideration when identifying retention lands. However, the disposal criteria identifies small, isolated tracts even though some of the tracts contain some resource values. It is recognized that some resource values would be sacrificed. Disposal of about 2,000 acres of critical deer and/or elk winter range represents less than 5 percent of the total.
274	51	The text has been changed (see Changes to Draft RMP EIS section in this document). See also responses 242, 243, 244, and 248.
275	56	These tracts are not located in the Book Cliffs. Tract 407 is private land. It has been removed from the map (see Changes to Draft RMP EIS section in this document). Tracts 403, 404, 405, 406 and 408 will continue to be recommended for disposal because they are small isolated tracts.
276	57	These tracts have been recommended for disposal because they are small, isolated tracts (Tracts 330, 331, 341 and 342) (see Changes to Draft RMP EIS section in this document).
277	59	Tracts 115 and 116 are isolated tracts with no public access. Resource values on the lands will be analyzed further through an environmental assessment prior to a final decision on disposal or retention of the tracts. These tracts will continue to be recommended for disposal.
278	59	Resource values on the lands will be analyzed further through site-specific environmental assessments prior to a final decision on disposal or retention of the lands. Some potential disposal tracts were identified through public scoping comments both by companies and individuals. Tract 150 will continue to be recommended for disposal.
279	59	The acquisition criteria will be used for identifying other appropriate private parcels for acquisition through exchanges. Acquisition criteria is found on page 56 of the draft RMP EIS.
280	62	The BLM does not want to acquire private land that would become isolated public tracts; however, we recognize that there may be key private parcels with special resource values that BLM could try to acquire through exchange.
281	62	Public access will be reserved in patents where it is determined to be in the public interest to do so. These tracts will continue to be recommended for disposal.
282	62	Tracts 214 and 405 will continue to be recommended for disposal. If the lands are transferred, public access will be reserved in patents where it is in the public interest. See also response 246 (Tract 201), response 248 (Tracts 17, 18, 24 and 31), and response 278 (Tract 150).

Table 3. Responses to Public Comments—Continued

Response No.	Commenter No.	Response
283	67	Tract 332 is a small, isolated parcel. It will continue to be recommended for disposal. Existing land uses will be considered in a site-specific environmental assessment and land report prior to a decision on retention or disposal.
284	68	This exchange proposal will be considered after the RMP is completed and as funding permits. The proposal will be evaluated using the acquisition criteria listed on page 56 of the draft RMP EIS.
285	74	The lands identified in your letter have been reevaluated. These lands will continue to be in the retention category, however, because they are part of a fairly large block of public land suitable for multiple use management.
		SOCIAL AND ECONOMIC CONDITIONS
286	A5	The analysis of environmental impacts includes only those elements likely to be significantly affected by the alternative. The RMP team determined that the Preferred Alternative would not have a significant impact on agriculture, including its social and economic conditions.
		TRANSPORTATION MANAGEMENT
287	A11	Throughout the years, BLM has received numerous comments that indicate a lack of public access in this area. Please refer to the transportation narrative on page 100 in the draft RMP EIS. This section identifies easement acquisition needs for the De Beque area. The narrative on page 60, paragraph 2, of the draft discusses implementation of the RMP as it pertains to easement acquisition in the De Beque and Book Cliffs area.
288	17	At present, there is no legal basis for this procedure. This suggestion would make the easement vulnerable to the status of the grazing permit. The proposal to tie an easement to a grazing permit could result in no easement if the grazing permit were cancelled. An easement is a legal right where a grazing permit is a privilege. The procedures involved in establishing or revoking an easement are completely different than that of a grazing permit.
289	34	BLM uses the problem solving approach in negotiations for all easements. Our acquisition specialist will be required to surface all objections and consider all alternatives. He/she will conduct all landowner contacts in a courteous and professional manner. If, however, this has been accomplished and the easement is denied by the landowner, use of condemnation proceedings will be analyzed and may be initiated. Although condemnation is considered a last resort approach to acquisition, it cannot be ruled out completely.
290	51	The areas you have identified presently open to the public do not have legal public access. Legal public access is important as it becomes public record. Even though a road is continually used by the public and meets the requirements of a public road, it is not a public road unless it has been determined by court or identified by the county as a public road. A transportation plan will be developed and a priority of easement acquisition will be outlined. Many variables will be analyzed in the development of the priority system. Because easements are restrictions to property and just compensation is required, they tend to be time consuming to process.
291	51	The road identified under this proposal ties to the county road that passes through the Fruita Reserve. This route allows for administrative access only. Map reference 33 allows for public access to Snyder Flats. Coordination with the county and the U.S. Forest Service would be necessary for this acquisition.
292	51	See response 290.
293	54, 61, 63, 85	Please refer to page 60, paragraph 2, of the draft RMP EIS. Possibly there are areas out of De Beque that would not support a need for an easement. The workshop referenced in paragraph 2 will be of great value in identifying these areas. Hopefully, the workshop will also identify areas where public access is needed. The purpose of the workshop will be to limit acquisition of easements to only those areas that accomplish the greatest benefit to the public.
294	57	The Preferred Alternative proposal is to acquire administrative access and not public access.
295	62	Wildlife management was not a concern in those areas. At this point in time, the Northwest Regional Office of the Colorado Division of Wildlife has not identified a need for access into these areas for wildlife management purposes.
296	62	Signs are placed on public land administered by the BLM; however because of a limited budget, signs are restricted to those highly sensitive use areas where problems exist. Trespass on private property is the responsibility of the landowner.
297	64	When the RMP is completed and approved, activity plans will be initiated. At this stage in the planning process, the transportation plan will be developed. Several districts and resource areas within the region have working transportation plans that will be reviewed prior to completion of the Grand Junction RMP.
298	85	The access into Hopple Gulch and Tater Hills is for administrative purposes and does not include public access. When a long-term management use for an area is identified, BLM is required to pay fair market value for the access and enter into an easement to protect the rights of the landowner.

Table 3. Responses to Public Comments—Continued

Response No.	Commenter No.	Response
		PUBLIC UTILITIES MANAGEMENT
299	22	Sensitive plant locations, *Cryptantha elata* site, and Badger Wash uplands have been added under the sensitive column, Preferred Alternative, Table 2-20. Also standard design practice 19 to protect sensitive plant species from surface-disturbing activities has been added to Appendix C (see Changes to Draft RMP EIS section in this document).
300	51	The acreage figures shown in Table 2-20 and the narrative alternative descriptions were calculated from maps of the specific resource concerns. Table 2-20 has been changed to indicate acres.
301	78	No definite corridor was specified along the northern boundary of the resource area since topographic constraints will dictate the routing of future utility projects over the Book Cliffs.
302	84	The use of an existing corridor is generally preferable as opposed to cross-country routing. However, several other factors must be considered, such as the size of the project, the topography, and other management objectives. Thus, BLM does not wish to mandate the use of existing corridors in all circumstances.
		GENERAL
303	37	The methodology for developing the emphasis areas is described in detail in Appendix A, draft RMP EIS. Oil shale was not considered an issue to be addressed in this RMP (see p. 14).
304	68	The recommendations and proposals outlined in this RMP EIS, although displayed on the maps as affecting public and private land, are only directed toward public land management.
305	73	It is not a requirement that the Preferred Alternative include aspects from all the other alternatives. The Preferred Alternative was developed using aspects from the other three alternatives. However, it also incorporates some recommendations that were developed specifically for the Preferred Alternative. This approach provides for a rational and balanced management of the public land (see draft RMP EIS, Chapter 1, p. 21, Criteria Used to Select Preferred Alternative).
306	86	The BLM's policy is to involve the public and local, state, or federal governments or agencies in the planning process. Attempts will be made, where appropriate, to gain input from these entities when site-specific proposals or actions are initiated.
307	86	Decisions in the plan will be implemented over a period of years and must be tied to the BLM budgeting process. Therefore, priorities will be established for each resource to guide the order of implementation. The priorities will link the planned actions in the resource management plan with the budget process. Priorities for each program will be reviewed annually to help develop the annual work plan commitments for the coming year. The priorities may be revised based upon new administrative policy, new Departmental directions, or new Bureau goals. The priorities of implementation will be presented in the RMP record of decision document.

CHANGES TO DRAFT RMP EIS

CHANGES TO DRAFT RMP EIS

This section consists of text and map changes to the draft RMP EIS. These changes were made in response to comments or internal review by BLM. The large number of changes listed is due to the ripple effect of several major changes (those listed in the Introduction section). While every effort was made to catalogue effects of these major changes, there may nevertheless be instances where a resultant change was not noted. Any change noted once, however, should be considered as applicable in all instances when the affected resource is discussed.

TEXT CHANGES

Table 4 shows text changes made in response to public comments. Changes are arranged by resource, chapter number, paragraph and sentence number.

Table 4. Text Changes to Draft RMP EIS

Location of Change	Change
LOCATABLE MINERALS MANAGEMENT	
Page 28, Table 2-3, last column under "Alternative"	Change "CA" to "PA."
Page 28, Table 2-3, Open to location, PA column	Change "1,180,881" to "1,163,628"
Page 28, Table 2-3, Closed to location, item "b", PA column	Change "154,067" to "171,320"
Page 29, Table 2-3, item "1. g.", PA column	Change '56,315" to "73,568"
Page 29, Table 2-3, Total, PA column	Change "154,067" to "171,320"
Page 29, Table 2-3, Total Existing and Additional Withdrawals, PA column	Change "278,510" to "295,763"
Page 29, Table 2-3, Total Existing and Additional Withdrawals	Add a footnote "b" behind the totals for this entry, i.e., 192,843[b], 124,843[b], 566,062[b], and 295,763[b].
Page 29, Table 2-3, footnote	Add a footnote "b" following footnote "a"; "[b]This includes 24,480 acres covered under PL 359."
Page 418, first column	Add the following new entry: "LOCATABLE MINERALS. These minerals include but are not limited to gold, silver, lead (metalics) and fluorspar, gypsum, mica (nonmetalics). These minerals may be staked and claimed under the *General Mining Law*."
COAL MANAGEMENT	
Page 30, Table 2-4, item "b. 4.", CA and PA columns	Change "[d]0" to "[d]24,421"
Page 201, second column, Impacts from Coal Management, second paragraph, third sentence	Add at the beginning of this sentence: "In the short term,"
Page 201, second column, Impacts from Coal Management, third paragraph, first sentence	Delete the phrase "(identified as unsuitable)."
OIL AND GAS MANAGEMENT	
Page 31, Table 2-5, Open to leasing, item "a", PA column	Change "624,701" to "641,601"
Page 31, Table 2-5, Total, PA column	Change "1,309,951" to "1,293,051"
Page 31, Table 2-5, Closed to leasing, PA column	Change "149,087" to "166,340"
Page 35, Table 2-6, Visual Resource Management, Subtotal, PA column, Others	Change "121,420" to "115,420"
Page 35, Table 2-6, Recreation Resource Management subsection, The Palisade ONA entry, third column from right	Change "1,920" acres to "19,178" acres.
Page 35, Table 2-6, Recreation Resource Management subsection, Subtotal entry, third column from right	Change "5,420" to "22,678."

Table 4. Text Changes to Draft RMP EIS—Continued

Location of Change	Change
Page 35, Table 2-6, Wilderness Management subsection, Dominguez Canyon entry, fourth column from right	Change "56,315" to "73,568."
Page 35, Table 2-6, Wilderness Management subsection, Subtotal, fourth column from right	Change "149,087" to "166,340."
Page 35, Table 2-6, Wilderness, Subtotal, PA column, No Leasing	Change "0" to "166,340"
Page 35, Table 2-6, Gross Total, PA column, No Leasing	Change "149,087" to "166,340"
Page 35, Table 2-6, Gross Total, PA column, NSO	Change "131,340" to "148,598."
Page 36, Table 2-6, Other Stipulations Estimated Overlap, PA column, Others	Change "−360,220" to "−354,220"
Page 36, Table 2-6, Adjusted Total, PA column, No Leasing	Change "149,087" to "166,340"
Page 36, Table 2-6, Adjusted Total, PA column, NSO	Change "131,340" to "148,598"
Page 65, Table 2-23, Oil and Gas Management subsection, Open to Leasing with standard lease terms, PA column	Change "624,201" to "641,601."
Page 65, Table 2-23, Oil and Gas Management subsection, Open to Leasing, Total open, PA column	Change "1,309,711" to "1,293,051."
Page 65, Table 2-23, Oil and Gas Management subsection, Closed to Leasing entry, PA column	Change "149,087" to "166,340."
Page 240, second column, subparagraph number 5 near bottom of page	Delete the phrase "BLM approved engineering firm" and replace with "certified professional engineer."
Page 242, second column, paragraph 2, third sentence	Delete this sentence which reads: "The blooie pit should be in at least 50 percent cut."
Page 245, sixth paragraph, first sentence	Delete the first sentence beginning "On sites where poor quality top soil..." and replace with "On sites where the ability to achieve acceptable reclamation is reduced because the existing top soil has been lost or mixed with less desirable material during the course of the project, enough good quality top soil to cover the disturbed area (specify depth) in inches will be hauled in and distributed."
Page 245, ninth paragraph	Delete the "x" in the PA column.
Page 245, between the ninth and tenth paragraphs	Add the following new paragraph and insert an "x" in the PA column: "In areas where ground water contamination may be a problem, all sewage and human waste will be removed from the site and taken to an approved disposal facility. Bore hole disposal may be used where contamination is not a problem. Bore holes must be fenced or covered at all times to eliminate safety hazards. This should prevent ground water pollution and reduce safety hazards while minimizing additional costs."
Page 246, third paragraph, third sentence	Begin a new paragraph here preceded by: "Any hazardous wastes will be removed immediately after drilling and disposed of in a manner approved by the Environmental Protection Agency."
Page 247, second paragraph, first and second sentences	Delete the first sentence and the first part of the second sentence that reads "The pipe must be capped with a steel plate which has the well identity and..." Replace with the following: "The abandonment marker must be at least 4 inch diameter pipe, buried at least 3 feet deep and embedded in cement. The pipe must be capped with a steel plate at the surface. The plate must be a minimum of 1/4 inch thick with a surface area less that 2 feet by 2 feet and have rounded corners. The plate must have the identity and..."
Page 247, second paragraph, PA column	Add a footnote "2" beside the "x."
Page 247, bottom of table	Add the following footnote "2:" "²This will be applied to dry holes in WSA."
Page 267, stipulation 3, first paragraph	Replace this paragraph with the following: "The following portions of the lease include land with greater than 40 percent slopes: (fill in legal description). In order to avoid or mitigate unacceptable impacts to soil, water, and vegetation resources on these lands, special design practices may be necessary and higher than normal costs may result. Where impacts cannot be mitigated to the satisfaction of the authorized officer, no surface-disturbing activities shall be allowed."
MINERAL MATERIALS MANAGEMENT	
Page 38, Table 2-7, Wilderness Study Areas entry, (item p), PA column	Change "149,087" to "166,340."

Table 4. Text Changes to Draft RMP EIS—Continued

Location of Change	Change
Page 38, Table 2-7, Total entry, PA column	Change "288,176" to "305,429."
Page 65, Table 2-23, Mineral Materials Management, Closed to sales and free use permits, item "b", PA	Change "282,341" to "299,241"
Page 65, Table 2-23, Mineral Materials Management, Total, PA	Change "288,176" to "305,429"
Page 68, Table 2-23, footnotes 2 and 3	Change "149,087" to "166,340" and "45,419" to "47,525," respectively. Insert the word "nonsuitable" between "recommended" and "for" in footnote 3.
Page 418, first column	Add the following new entry: "MINERAL MATERIALS. These minerals include but are not limited to sand, stone, gravel, pumice, and clay. These minerals are disposed of under the *Mineral Sales Act of 1947* though either sale or free use permits."
FOREST MANAGEMENT	
Page 40, Table 2-8, Pinyon-juniper woodlands unsuitable for management entry, Recommended wilderness areas, PA column	Change "15,717" to "17,167."
Page 40, Table 2-8, Pinyon-juniper woodlands unsuitable for management entry, Total	Change "428,840" to"426,290."
Page 65, Table 2-23, Forest Management subsection, Pinyon-juniper woodlands unsuitable for management entry, PA column	Change "424,840" to "426,290."
PALEONTOLOGICAL RESOURCE MANAGEMENT	
Page 39, first column, first paragraph under Implementation	In the first and second sentences, change "surface surveys" to "clearances." In the third sentence, insert "significant" between the words "Any fossils." In the fourth sentence, insert "(or a diagnostic portion thereof)" between the words "fossils would."
WILDLIFE MANAGEMENT	
Page 41, Table 2-9, Terrestrial Wildlife, Deer and Elk, CCMA column, ProA column, and PA column	Under CCMA column, change "761,043" to "1,020,783." Under the ProA column, change "731,697" to "729,137." Under the PA column, change "1,011,859" to "1,010,389."
Page 66, Table 2-23, Wildlife Management, Active habitat management, upland wildlife, CCMA and PA columns	Change the numbers "792,033" and "1,018,059" to "1,051,773" and "1,016,589" respectively.
Pages 95, 98, 100, 101, 102, 104, 106, and 108 under Wildlife	Delete the sentence that concern maintaining ripariang habitat to favor the tallest native plant species in woody plant habitat and replace with the following sentence: "Woody riparian habitat would be maintained to favor the tallest plant species native to each site while promoting diversity in plant heights and species."
Page 124, second column, last paragraph	Change the numbers "11,400," "1,000," "25,400," and "2,800" to "12,800," "850," "25,700," and "2,750" respectively.
Page 208, second column, first full paragraph	Change "big game population games" to "big game population goals."
Page 282, Table F-4, Bang's-Dominguez, fourth column	Change acres from "133,035" to "131,565."
Page 282, Table F-4, Wilderness, Priority column	Change the priority from "15" to "16."
Page 418, between sixth and seventh entries	Add: "LIVESTOCK TRAIL. A route that livestock (cattle, sheep, horses) are driven over. A route used in the transport of domestic grazing animals by means other than trucking or allowing the animals to drift on their volition."
THREATENED AND ENDANGERED SPECIES MANAGEMENT	
Page 43, first column, Threatened and Endangered Species Management, between first and second paragraphs	Add a new paragraph: 'Under all alternatives, stipulations to protect the areas of concentration of bald eagles, peregrine falcons, and two federally listed cacti would be added to permits in these areas.'

Table 4. Text Changes to Draft RMP EIS—Continued

Location of Change	Change
Page 43, first column, Implementation, first paragraph, first sentence	Following the first sentence add: "Under all alternatives, environmental assessments would be prepared on specific projects following the general land use allocations authorized in the RMP. The environmental assessments would determine whether specific projects 'may affect' threatened and endangered species. If the assessment shows a 'may affect' situation exists, the Fish and Wildlife Service would be contacted for formal Section 7 consultation."
Page 44, Table 2-10, Active habitat management, unique and sensitive species, PA column	Change the number "55" to "1,525."
Page 44, Table 2-10, Active habitat management, Endangered species, PA column	Change the number "25,275" to "26,212."
Page 66, Table 2-23, Threatened and endangered species management, Upland wildlife, PA column	Change the number "55" to "1,525" and the number "24,275" to "26,212."
Page 78, first column, first paragraph	Change "February 13" to "March 15."
Page 81, first column, first partial paragraph, first full sentence beginning "Suitable habitat..."	Delete this sentence and replace with the following: "The BLM would encourage the restoration of the humpback chub, Colorado River squawfish, razorback sucker, and bonytail chub. The BLM would also cooperate in this restoration."
Page 89, second column, Threatened and Endangered Species, second paragraph, first sentence	Add the "Colorado River squawfish" to the species listed.
Pages 95, 98, 100, 101, 106, 108, and 255 under Threatened and Endangered Species	Change "February 15 to July 15" to "March 15 to July 1."
Page 105, second column, Special Management Areas	Add the following to the end of this paragraph: "The Badger Wash hydrologic study area and adjacent sensitive plant area would be designated an area of critical environmental concern (1,520 acres)."
Page 129, Table 3-9, Whooping crane, Remarks section	Delete "experimental" flock and replace with "presently nonreproducing" flock.
Page 129, Table 3-9, Razorback sucker, Remarks section	Delete "no" evidence and replace with "little" evidence.
Page 129, Table 3-9, Colorado River squawfish, Remarks section	Insert the words "banks along" between the words "Green Rivers;" and "habitat."
Page 130, Table 3-9, Ferruginous hawk, Remarks section	Delete "Only one nesting pair" and replace with "Low nesting density."
Page 130, Table 3-9, Great blue heron, Remarks section	Change "only one active heronry" to "only two active heronries."
Page 130, Table 3-9, Uinta Basin hookless cactus, Remarks section	Add the scientific name to this entry: "*Sclerocactus glaucus*."
Page 130, Table 3-9, Spineless hedgehog cactus	Add the scientific name to this entry: "*Echinocereus triglochidiatus inermis*."
Page 130, Table 3-9, Dolores skeletonweed	Add the scientific name to this entry: "*Lygodesmia doloresensis*."
Page 130, Table 3-9, Dolores skeletonweed, Remarks section	Delete "one report in the resource area" and replace with: "on Cutler Formation; shows signs of grazing impacts."
Page 130, Table 3-9, Harrington's beard tongue	Delete this entry in its entirety.
Page 130, Table 3-9, Sedge fescue	Add the scientific name to this entry: "*Festuca dasyclada*."
Page 130, Table 3-9, Dragon milkvetch	Add the scientific name to this entry: "*Astragalus lutosus*."
Page 130, Table 3-9, Sun-loving meadowcue	Add the scientific name to this entry: "*Thalictrum heliophilum*."
Page 130, Table 3-9, Grand Junction milkvetch	Add the scientific name to this entry: "*Astragalus linifolius*."
Page 130, Table 3-9, Plants	Add the following entries to this table: "*Astragalus debequaeus*, 3 (Rank of Endangerment), Medium (Sensitivity), s (Status), De Beque area, low elevation (Remarks); *Lomatium latilobum*, 1 (Rank of Endangerment), Medium (Sensitivity), 2s (Status); *Astragalus musiniensis*, 12 (Rank of Endangerment), Medium (Sensitivity), s (Status)."
Page 130, Table 3-9, Plants	Delete Harrington's beard tongue entry from this table.
Page 130, Table 3-9, Plants subsection, column 2	Change the rank of endangerment for these plants from "1, 2, 3, 4, 6, 7, 8, 9, 10" to "4, 5, 2, 6, 7, 8, 9, 10, 11" respectively.
Pages 129 and 130, Table 3-9, column 2	Change the abbreviations "H, M, L" to "High, Medium, Low."
Page 155, first column, third full paragraph, last sentence	Replace "might affect" with "might impact."
Page 156, second column, first paragraph, first sentence	Change "beneficially affected" to "benefited."

Table 4. Text Changes to Draft RMP EIS—Continued

Location of Change	Change
Page 175, first column, first paragraph, first sentence	Replace "beneficially affected" with "benefited."
Page 175, first column, first paragraph, last sentence	Delete this sentence and replace with: "Any adverse impacts resulting from human use of the public land in the next 20 years would not be sufficient to place any species at risk."
Page 191, first column, second paragraph, last sentence	Change "may affect the species" to "may concern the species."
Page 209, second column, second paragraph	Delete the phrase "with a very high potential for existence."
Page 209, second column, second paragraph, first sentence	Replace "areas (sites)" with "ranges."
Page 209, first column, second paragraph, last sentence	Change "may affect the species" to "might influence the situation of the species."
Page 209, second column, fourth paragraph	Delete this paragraph and replace it with: "Implementing four habitat management plans for sensitive, threatened and endangered species would increase the chance of maintaining or improving populations of the bald eagle, peregrine falcon, Uinta Basin hookless cactus, Great Basin silverspot butterfly, and perhaps the endemic Colorado River fishes and other species."
Page 210, first column, fourth paragraph	Add a new sentence to the end of this paragraph: "However, at the time of application for a permit to mine coal, known sites of sensitive species not reviewed under the criteria would receive consideration, which likely would be adequate to protect the species."
Page 211, first column, third paragraph, second sentence	Change "three wilderness study areas" to "four wilderness study areas."
Page 255, first column, subparagraph number 2	Change "December 15" to "February 15."
Page 282, Table F-4, Colorado River entry, acres column	Change acres from "12,136" to "24,272."
Page 282, Table F-4, first column following the Pyramid Rock entry	Add the following new entry: "Rough Canyon, 15 (Priority column), 1,470 (Acres column), Spineless hedgehog cactus, sensitive plant and animal species (Key Species Emphasis column)."
Page 282, Table F-4, Wilderness entry, acres column	Change acres from "102,240" to "90,104."
Page 317, second column, second full paragraph, seventh sentence	Delete "The order of endangerment for" and "razorback chub" from this sentence.
LIVESTOCK GRAZING MANAGEMENT	
Page 102, first column, Livestock Grazing	Add at end of paragraph: "where practical alternatives (such as horseback) do not exist, maintenance or other activities may be accomplished through the occasional use of motorized equipment such as backhoes to maintain stock ponds, pickup trucks for major fence repair or special equipment to repair stock watering facilities."
CULTURAL RESOURCE MANAGEMENT	
Page 46, first column, second paragraph, second sentence	Change "archaeological" to "prehistoric."
Page 131, second column, first partial paragraph, fifth full sentence	Change "(archaeological and historical)" to "(prehistoric and historic)."
Page 212, first column, first partial paragraph, last sentence	Add: "beyond the extent required by law" at the end of the last sentence.
RECREATION RESOURCE MANAGEMENT	
Page 49, Table 2-13, PA column, last entry, third sentence	Change "The Palisade itself (1,920 acres)..." to "The Palisade area (19,178 acres)..."
Page 49, Table 2-13, PA column, last entry, third sentence	Insert "natural," between the words "protect" and "scenic."
Page 49, Table 2-13, PA column, last entry, fifth sentence	Insert "and The Palisade" between the words "Valley" and "would." Also insert "and the remainder of The Palisade ONA" between the words "canyon" and "under."
Page 95, first column, second full paragraph, second sentence	Delete this sentence.

Table 4. Text Changes to Draft RMP EIS—Continued

Location of Change	Change
VISUAL RESOURCE MANAGEMENT	
Page 50, Table 2-14, Wilderness study areas entry, (item a), PA column	Change "149,087" to "166,340."
Page 51, Table 2-14, Class II (item b) and undesignated (item d) entries, PA column	Change "106,879" to "124,131" and "838,499" to "821,241."
OFF-ROAD VEHICLE MANAGEMENT	
Page 51, Off-Road Vehicle Management, Proposed Management Actions, second column, second full paragraph, first sentence	Delete "all alternatives" and replace with "Continuation of Current Management, Commodity and Protection Alternatives."
	Add following the first sentence: "Under the Preferred Alternative, three areas would be provided for cross-country vehicle use and competitive events."
Page 52, Table 2-15, Closed entry, last column (PA)	Change "159,274" to "176,527."
Page 52, Table 2-15, Open entry, last column (PA)	Change "479,870" to "462,612."
Page 52, Table 2-15, Intensive/competitive use areas, last column (PA)	Change "(10,240)" to "(11,240)."
Page 67, Table 2-23, Off-Road Vehicle Management subsection, Closed entry, PA column	Change "159,274" to "176,527."
Page 105, first column, Off-Road Vehicles, second to last sentence	Delete the sentence beginning "The area north of I-70..." and and replace with the following: "Three areas would be designated open to cross-country vehicle use and competitive events: (1) The area north of I-70 and south of the Book Cliffs from the east branch of 27-1/4 Road (Carpenter Road) east to 32 Road (10,240 acres); (2) A 600-acre area on the east side of 25 road about 1-1/2 miles north of the Highline Canal, and (3) A 400-acre area on the east side of 18 Road immediately north of where 18 Road crosses the Highline Canal.
Page 105, first column, Off-Road Vehicles	Add as second paragraph: "Competitive events proposed outside of established open areas would be considered on an individual basis. The intent of permit processing would be to keep most of an event on existing roads and trails (most washes are on existing trails) and allow up to 25 percent of the total race mileage cross-country (off existing roads and trails). The areas where cross-country use might be authorized would be within the rugged, relatively barren zones of exposed mancos shale that are scattered throughout the Grand Valley desert. Competitive events would be monitored to ensure compliance with permit requirements and to prevent excessive cross-country use from damaging soil structure in any one area. Competitive use would not be allowed to occur repeatedly in any one area outside of established open areas."
WILDERNESS MANAGEMENT	
Page 53, Table 2-16, Dominguez Canyon entry, PA column	Change "56,315" suitable (S) to "73,568" and "19,495" nonsuitable (NS) to "2,232."
Page 53, Table 2-16, Total entry, PA column	Change "149,087" suitable (S) to "166,340" and "94,688" nonsuitable (NS) to "77,425."
Page 62, Table 2-20, Gross Total and Total entries at bottom of table, PA column	Change "272,737" to "307,258" and "267,737" to "302,258," respectively.
Page 64, Table 2-22, Full entry, PA column	Change "976,790" to "959,890."
Page 67, Table 2-23, Visual Resource Management subsection, Class I entry, PA column	Change "154,200" to "171,460."
Page 67, Table 2-23, Wilderness Management, Recommended as suitable for wilderness, Black Ridge Canyons, Black Ridge Canyons West, Dominguez Canyon, and Total entries, PA column	Change "19,830," "54,470," "56,315," and "149,087" to "19,595," "54,342," "73,568," and "166,340," respectively.
Page 101, second column, fourth full paragraph, first sentence	Change "149,087 acres" to "166,340 acres"; change "(54,342 acres)" to "(47,907 acres)"; change "56,315 acres)" to "(73, 568 acres)".
Page 215, second column, first paragraph, last sentence	Delete "unless mineral development takes place."

Table 4. Text Changes to Draft RMP EIS—Continued

Location of Change	Change
Page 215, second column, third paragraph, first sentence	Insert "part of" between "and" and "The Palisade."
Page 216, first column, third full paragraph, first sentence	Insert "part of" between "and" and "The Palisade."
Page 216, first column, last paragraph, last sentence in column	Delete "these areas" and replace with "Demaree Canyon, Little Book Cliffs, and the lower part of The Palisade..."
Page 216, second column, second full paragraph, first sentence	Change "(149,087 acres)" to "(166,340 acres)."
Page 216, second column, fourth full paragraph, second sentence	Change "(1,920 acres)" to "(19,178 acres)."
Page 216, second column, last paragraph, first sentence	Change "(1,920 acres)" to "(19,178 acres)" and insert ", protect scenic values" between "WSA" and "and preserve."
Page 217, first column, second paragraph, first sentence	Change "(149,087 acres)" to "(166,340 acres)."
Page 217, first column, second paragraph, second sentence	Change "(1,920 acres)" to "(19,178 acres)."
Page 217, first column, fourth paragraph, first sentence	Change "(149,087)" to "(166,340)" and add the following sentence: "Wilderness resources would also be partially protected on 19,178 acres of The Palisade WSA, which is recommended for management as an outstanding natural area."
Page 217, first column, fourth paragraph, second sentence	Insert "recommended for wilderness" between "areas" and "would be."
Page 217, first column, last paragraph	Delete last sentence beginning "Once released..."
Page 302, Table I-1, Dominguez Canyon entry and Total, PA column	Change "56,315," "19,495," "149,087," and "94,688" to "73,568," "2,232," "166,340," and "77,425," respectively.
Page 303, first column, third paragraph, first sentence	Add "because of its mineral values" at the end of this sentence.
Page 303, second column, last paragraph, first sentence	Add "...because of its mineral values. Wilderness designation would also increase the costs of administering the wild horse herd."
Page 305, second column, first full paragraph, second sentence	Delete this sentence and replace with "The emphasis of the area would be on protection of natural, geologic, and scenic values of The Palisade."
Page 305, second column, first full paragraph, third sentence	Change "(1,920 acres)" to "(19,178 acres)" and delete the last part of the sentence beginning "and managed to protect..."
Page 305, second column, first full paragraph, fourth sentence	Delete "Configuration, steep slopes, and potential trespass problems..." and replace with "manageability problems, conflicts with established uses, and lack of support..."
Page 306, first column, first full paragraph	Delete this paragraph and replace with the following: "A total of 73,568 acres (see Maps 1 and 2, this document) would be recommended as preliminarily suitable for wilderness designation and managed according to BLM's Wilderness Management Policy. A total of 2,232 acres would be recommended as nonsuitable. Of the 2,232 acres recommended nonsuitable, 1,192 acres above the rims would be recommended nonsuitable to minimize vehicle and woodcutting trespass; 1,000 acres in the Palmer Gulch/Open Draw area would be excluded to make it easier to control vehicle access and to remove imprints of man from the unit; and 40 acres would be excluded to better define the boundary."
Page 312, Table I-3, The Palisade WSA, Wilderness, Preferred column, second sentence	Change "major" adverse impact to "minor."
Page 312, Table I-3, The Palisade WSA, Oil and Gas, Preferred column	Change "...The Palisade (1,920 acres)" to "...The Palisade ONA (19,178 acres)"
Page 313, Table I-3, The Palisade WSA, Recreation, Preferred column	Change "(1,920 acres)" to "(19,178 acres)" and change "Major adverse impact" to "Minor adverse impact."
Page 313, Table I-3 Dominguez Canyon WSA, Forestry, Preferred column	Change "6,522 acres" to "7,972 acres."
Page 314, Table I-3, Dominguez Canyon WSA, Recreation Manageability column, second and third sentences	Delete everything following "adjustments would..." and replace with "help to minimize ORV conflicts."
Page 355, second column, first full paragraph	Add the following to the end of this paragraph: "Mountain lion and peregrine falcon are wildlife values found in this unit."
Page 369, first column, second full paragraph, fourth sentence	Add to the end of this sentence: "..., but wilderness designation would also increase the administrative cost of the wild horse range because of various restrictions that could be imposed on wild horse management."
Page 369, first column, second full paragraph, fifth sentence	Delete "overall" at the beginning of this sentence.
Page 375, second column, fourth paragraph, sixth sentence	Delete the word "not" in the first part of the sentence. Insert the word "not" between the words "but" and "wanting."
Page 387, second column, third sentence	Insert "in the lower elevations" between the words "vehicles" and "would."
Page 389, second column, third paragraph, first sentence	Insert ", totaling about 14 miles" between "rights-of-way" and "to minimize."

Table 4. Text Changes to Draft RMP EIS—Continued

Location of Change	Change
Page 390, first and second columns, Preferred Alternative Impacts	Delete the entire subsection under Preferred Alternative Impacts (eight paragraphs) and replace with the following: "Under this alternative, The Palisade WSA (26,050 acres) would be recommended nonsuitable for wilderness designation. A major portion of the unit (19,178 acres) would be managed as an outstanding natural area (ONA). "Impacts on Wilderness. Nondesignation would result in environmental impacts outside the ONA similar to those described in the No Action and No Wilderness Alternatives. Wilderness values would generally be protected inside the ONA. There would be a low adverse impact to wilderness over the long term. "Impacts on Locatable Minerals. Under this alternative, the WSA would be open to mineral location; however, the mineral potential is low. Locatable minerals would not be impacted. "Impacts on Oil and Gas. The area would be open to oil and gas leasing except the ONA would be protected by a no surface occupancy stipulation. Impacts outside the ONA would be similar to the No Wilderness Alternative. There would be minimal adverse impacts over the long term. "Impacts on Forestry. The WSA outside the ONA would be available for pinyon-juniper management and harvesting. The 19,178 acres inside the ONA would be unsuitable for woodland management and harvesting. Impacts outside the ONA would be similar to those described under the No Wilderness Alternative. Closing the ONA to pinyon-juniper management would be a minor adverse impact in the long term. "Impacts on Recreation. An area of 19,178 acres centered on The Palisade and the escarpment to the east would be managed as an ONA to protect natural, geologic, and scenic values. The area would also be closed to off-road vehicle use. The rocky spine called 'The Palisade,' including about 1,920 acres would be managed as a visual resource management Class I. The remainder of the ONA would be managed as a Class II. Primary management emphasis is to preserve these values for scientific and research use. Primitive non-motorized recreation use in the ONA would be allowed consistent with the protection of the ONA values. "The area outside the ONA would be managed to provide semi-primitive, motorized recreation. Off-road vehicle use outside the ONA would be limited to designated roads and trails. Off-road vehicle use would, over time, dominate the use of the lower portion of the WSA. Nondesignation of the WSA would result in the loss of primitive recreation opportunities in the lower basin areas that are accessible to motorized use. Primitive recreation uses would be maintained in the ONA part of the unit. Natural, geologic, and scenic would be protected and this would be a major beneficial impact over the long term. "Impacts on Off-Road Vehicles. Off-road vehicle impacts are discussed under the Recreation section.'
Page 396, first column, first paragraph	Insert "major" between "a" and "portion of." Change "(56,315 acres)" to "(73,568 acres)."
Page 396, first column, third paragraph, second, third, and fourth sentences	Delete these sentences and replace with the following: "Recommending 2,232 acres as nonsuitable would reduce conflicts between wilderness, off-road vehicle, and forest management, improve vehicle access control, and remove imprints of man."
Page 396, first column, last paragraph, first sentence	Insert "and" between "Middle Mesa" and "Steamboat Mesa." Delete "2,642 acres" and replace with "1,192 acres."
Page 396, first column, last paragraph, second and third sentences	Delete "6,522 acres" and replace with "7,972 acres."
Page 396, second column, third paragraph	Delete this paragraph and replace with: "Impacts would be similar to those discussed under the All Wilderness Alternative except for the boundary modifications."
Page 396, second column, fourth paragraph, first sentence	Delete "still."
Page 396, second column, fourth paragraph, third and fourth sentences	Delete these sentences.
Page 396, second column, last paragraph, first sentence	Delete "(56,305 acres)" and replace with "(73,568)."
Page 407, first column, last paragraph, first sentence	Change "75,000 acres" to "75,800."
Page 407, second column, second paragraph, first sentence	Delete "6,522 acres" and replace with "7,972 acres."
SPECIAL MANAGEMENT AREAS MANAGEMENT	
Page 55, Table 2-17, first column, Proposed for ACEC Designation (item g), PA column	Change acreage from "0" to "1,520."

Table 4. Text Changes to Draft RMP EIS—Continued

Location of Change	Change
Page 55, Table 2-17, first column, Proposed for ACEC Designation, Total, PA column	Change acreage from "0" to "1,520."
Page 55, Table 2-17, first column, Proposed for RNA Designation	Insert "and ACEC" between the words "RNA" and "Designation."
Page 55, Table 2-17, first column, Proposed for ONA Designation	Insert "and ACEC" between the words "ONA" and "Designation."
Page 55, Table 2-17, Proposed for ONA Designation, last entry	Change "(scenic values)" to "(natural, geologic, and scenic values)."
Page 55, Table 2-17, first column, Proposed for ONA Designation, PA column	Change acreage from "1,920" to "19,178."
Page 67, Table 2-23, Special Management Areas, Proposed for ACEC designation, Badger Wash Uplands (sensitive plants), PA column	Change the number "0" to "1,520."
Page 67, Table 2-23, first column, Proposed for RNA Designation	Insert "and ACEC" between the words "RNA" and "Designation."
Page 67, Table 2-23, first column, Proposed for ONA Designation	Insert "and ACEC" between the words "ONA" and "Designation."
Page 67, Table 2-23, Special Management Areas, last entry (item a)	Change "(scenic values)" to "(natural, geologic, and scenic values)."
Page 67, Table 2-23, Special Management Areas, last entry (item a), PA column	Change acreage from "1,920" to "19,178."
Page 108, second column, Special Management Areas	Delete this paragraph and replace with the following: "The Palisade (19,178 acres) would be designated an outstanding natural area to protect its natural, geologic and scenic values. The Palisade ONA would be closed to off-road vehicle use. The rocky spine called 'The Palisade' would be managed as a VRM Class I while the remainder of the ONA would be managed as a VRM Class II. The primary management emphasis is to protect the values of the ONA. Non-motorized recreation use in the ONA would be allowed consistent with the protection of these values. Unaweep Seep (37 acres) would continue to be designated a research natural area to protect rare butterflies."
	LAND TENURE ADJUSTMENT
Page 56, first column, end of first full paragraph before subheading "Acquisition"	Add a new category: "Cooperative Management Agreement. Under the Preferred Alternative, tracts 158, 159, 160, 161, 414, 415, 417, 418, 431, 432, 433, 201-CMA, 209-CMA, and 304 would be placed in a cooperative management agreement category (CMA). These tracts are shown on Maps 4 through 6 in this document. They contain riparian and recreational values. "Cooperative management tracts would be offered to interested and qualified agencies, local governments, or environmental groups for transfer or management under a cooperative management agreement. If these transfers or cooperative management agreements are not feasible, these tracts would not be recommended for disposal. All tracts retained and not managed by another agency, government, or group under a cooperative management agreement would receive little or no funds for on-the-ground management."
Page 56, Table 2-18, Disposal, items "a" and "b", PA column	Change "27,956" acres to "24,998" and "155" tracts to "140."
Page 56, Table 2-18, Proposed Management Actions	Add a new entry: "Cooperative Management Agreements. a. Acres. b. Tracts."
Page 56, Table 2-18, columns 2, 3, 4, and 5 opposite the new category "Cooperative Management Agreements"	Add "0" in columns 2, 3, and 4 and 1,360 in column 5 for acres. Add "0" in columns 2, 3, and 4 and "14" in column 5 for tracts.
Page 56, second column, second paragraph under Implementation, end of second sentence	Add: "Withdrawals such as Bureau of Reclamation withdrawals, oil shale withdrawals, and public water reserves would have to be revoked or modified by the holding agency prior to disposal of any encumbered tracts."
Page 56, second column, third paragraph	Delete this paragraph and replace with the following: "Interested and qualified agencies, local governments, and environmental groups would be contacted to determine their interest in acquiring or managing tracts identified for cooperative management."
Page 57, first column, last paragraph, second sentence	Change "27,956" acres to "24,998" acres.
Page 68, Table 2-23, Land Tenure, Disposal category, items "a" and "b", PA column	Change the acres from "27,956" and "155" to '24,998' and '140,' respectively.

Table 4. Text Changes to Draft RMP EIS—Continued

Location of Change	Change
Page 68, Table 2-23, Land Tenure	Add the following new entry: "Cooperative Management Agreement. a. acres, b. tracts."
Page 68, Table 2-23, Land Tenure, columns 2, 3, 4, 5 opposite the new category "Cooperative Management Agreement"	Add "0" in columns 2, 3, and 4 and "1,360" in column 5 for acres. Add "0" in columns 2, 3, and 4 and "14" in column 5 for tracts.
Page 105, second column, Areas Gd: Emphasis on Land Disposal, last paragraph on page, first sentence	Change "155" tracts to "140" and "27,956" acres to "24,998."
Page 106, first column, first partial paragraph, second line	Change "known not" to "not known."
PUBLIC UTILITIES MANAGEMENT	
Page 61, Table 2-20, Table Title	Add "(In Acres)" at the end of the table title.
Page 61, Table 2-20, first column, Threatened and Endangered Species, Sensitive plant species, PA column, Sensitive column	Change acreage from "0" to "73,600."
Page 61, Table 2-20, first column, Threatened and Endangered Species, *Cryptantha elata* site, PA column, Sensitive column	Change acreage from "0" to "3,700."
Page 61, Table 2-20, first column, Threatened and Endangered Species, Badger Wash Uplands, PA column, Sensitive column	Change from "0" to "1,230."
Page 62, Table 2-20, Recreation Resource Management subsection, The Palisade ONA, PA column, Unsuitable column	Change "1,920" to "19,178."
Page 62, Table 2-20, Wilderness Management, Dominguez Canyon entry, PA column, unsuitable	Change "56,305" to "73,568."
Page 62, Table 2-20, first column, Land Tenure Adjustments, PA column, Sensitive column	Change acreage from "27,956" to "24,998."
Page 62, Table 2-20, first column, Land Tenure Adjustments, Gross total, PA column, Sensitive column	Change acreage from "943,644" to "1,022,174."
Page 62, Table 2-20, first column, Land Tenure Adjustments, Total, PA column, Sensitive column'	Change acreage from "531,524" to "610,054."
Page 68, Table 23, Public Utilities Management, Suitability Recommendations, Sensitive (item b), PA column	Change acreage from "531,524" to "610,054."
FIRE MANAGEMENT	
Page 64, Table 2-22, Wilderness entry, PA column	Change "149,087" to "166,340."

MAP CHANGES (IN RESPONSE TO PUBLIC COMMENTS)

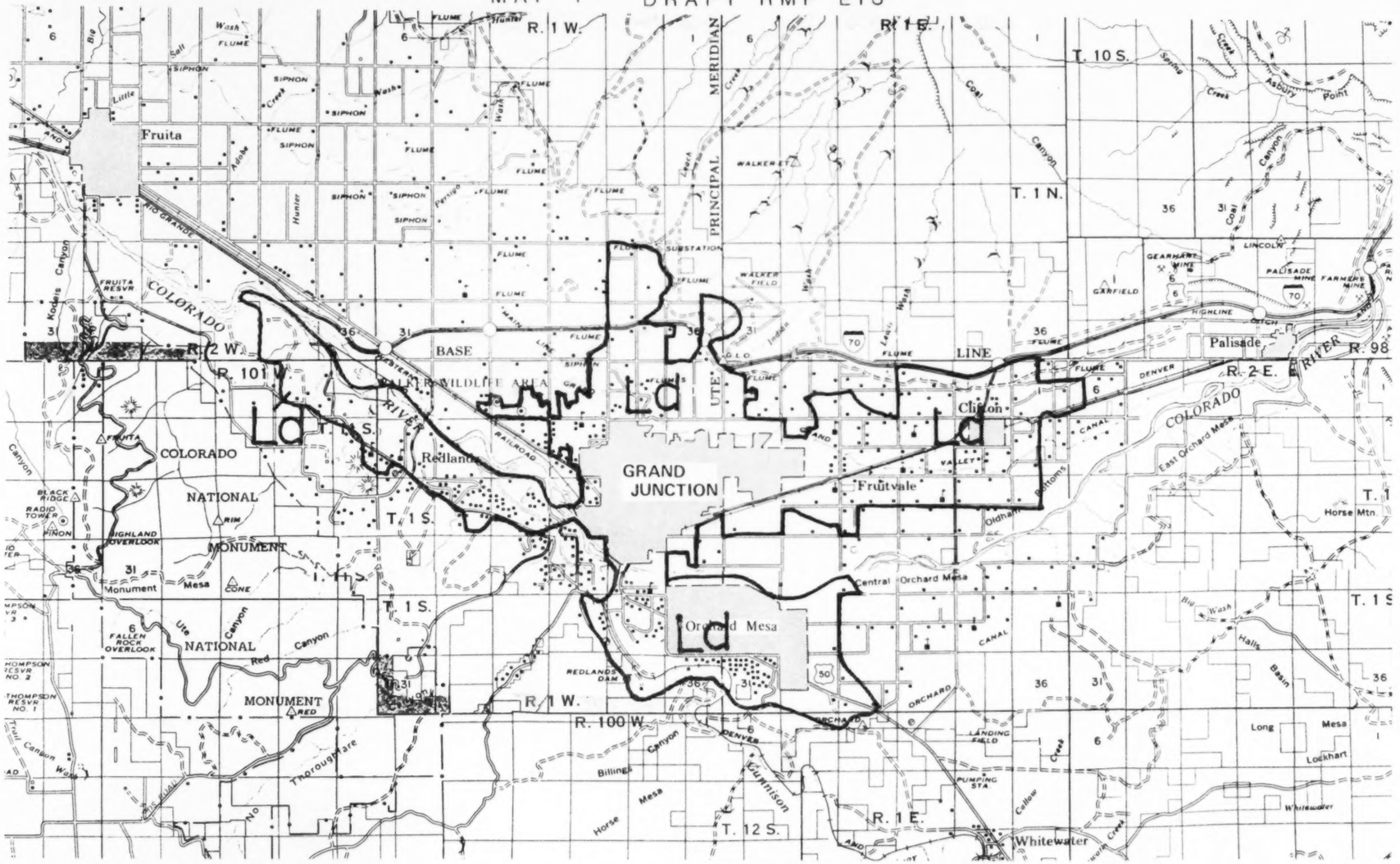
Maps 1 through 12 are map changes that were made in response to public comments.

MAP 1

AIR QUALITY MANAGEMENT

REVISED DESIGNATED NON-ATTAINMENT AREA

MAP 1 DRAFT RMP EIS



DOMINGUEZ CANYON CO - 070 - 150 - DOM
CO - 030 - 363

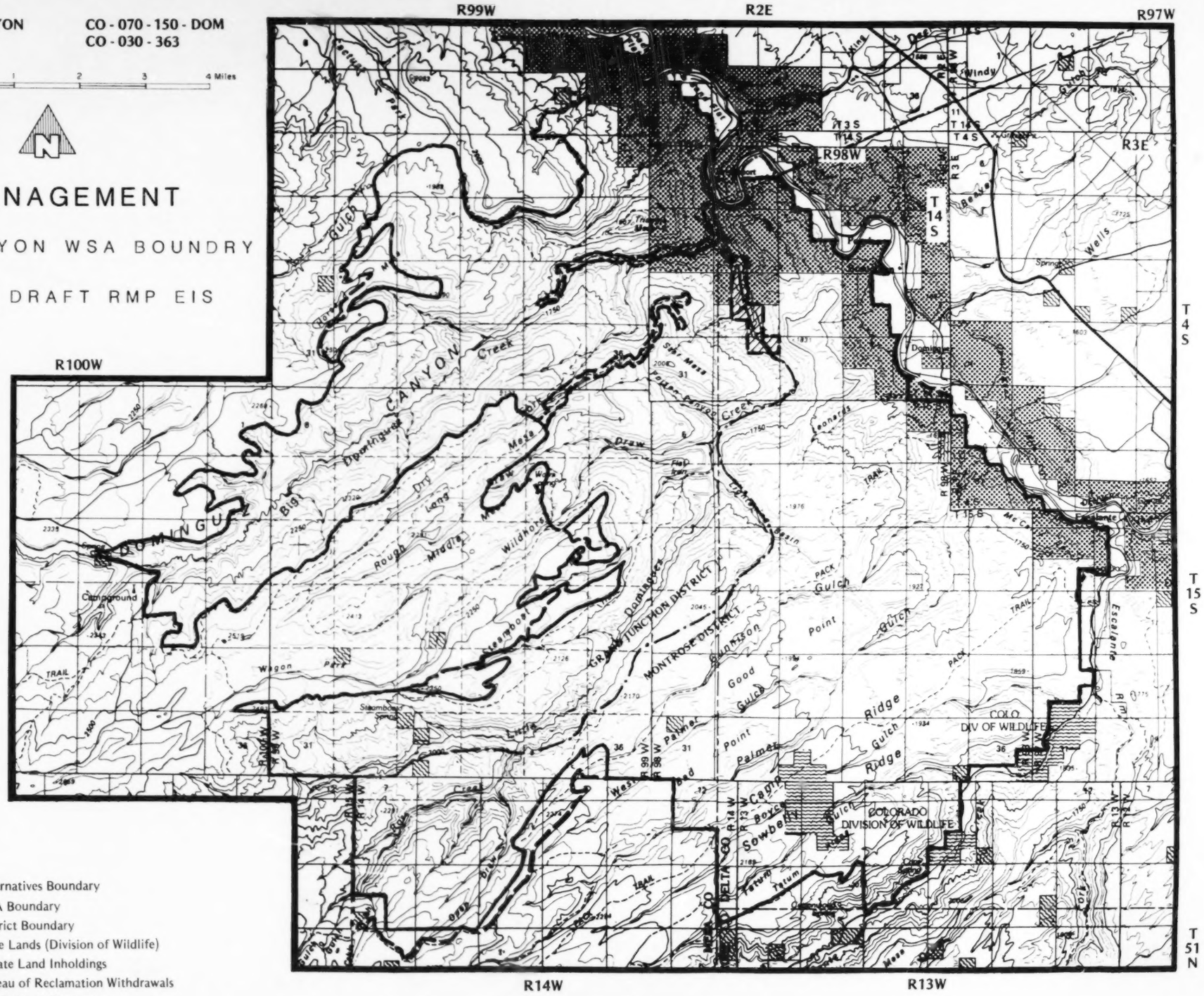
1 0 1 2 3 4 Miles

MAP 2

WILDERNESS MANAGEMENT

REVISED DOMINGUEZ CANYON WSA BOUNDRY

FIGURE I-28 APPENDIX I DRAFT RMP EIS



LEGEND

- Alternatives Boundary
- WSA Boundary
- District Boundary
- State Lands (Division of Wildlife)
- Private Land Inholdings
- Bureau of Reclamation Withdrawals
- Public Water Reserves

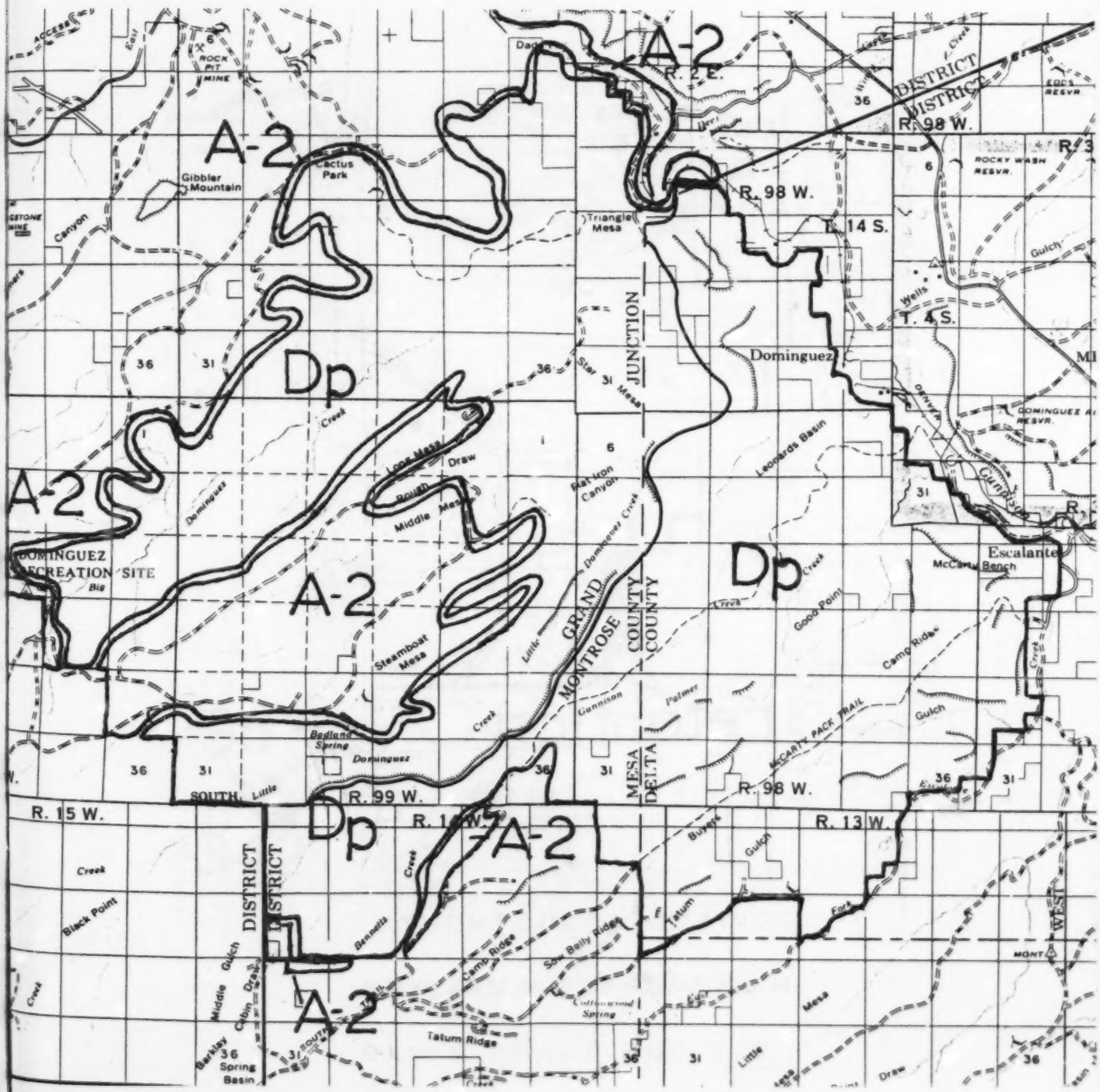
Dominquez Canyon Wilderness Study Area.

MAP 3

WILDERNESS MANAGEMENT

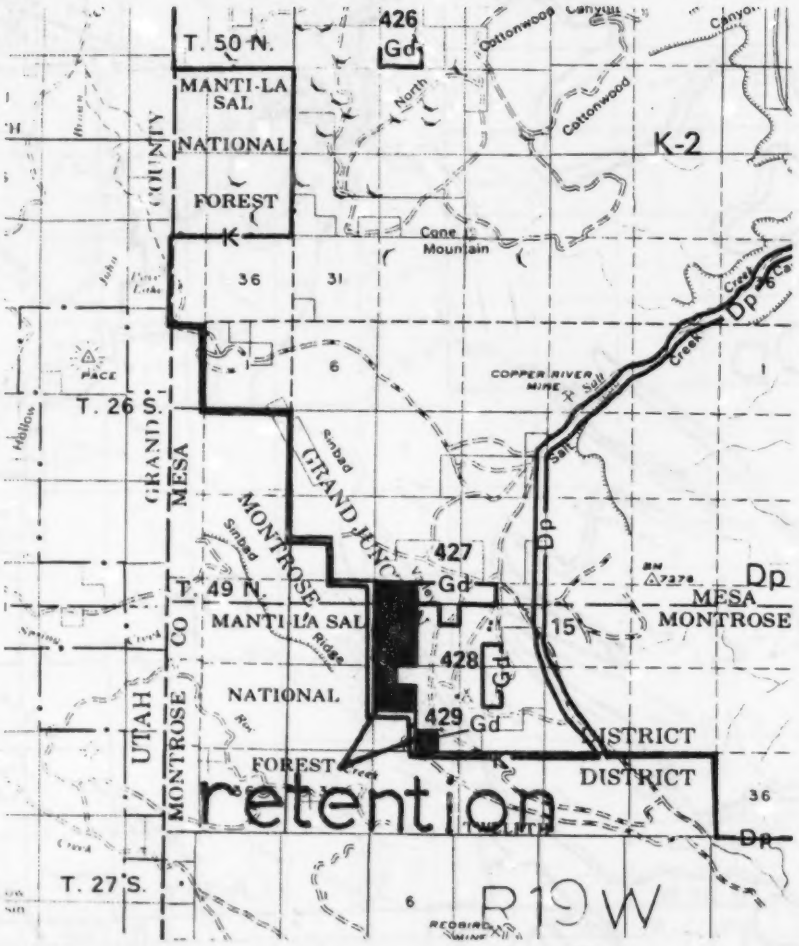
REVISED DOMINGUEZ CANYON WSA BOUNDRY

MAP 5 DRAFT RMP EIS



MAP 4

LAND TENURE ADJUSTMENTS

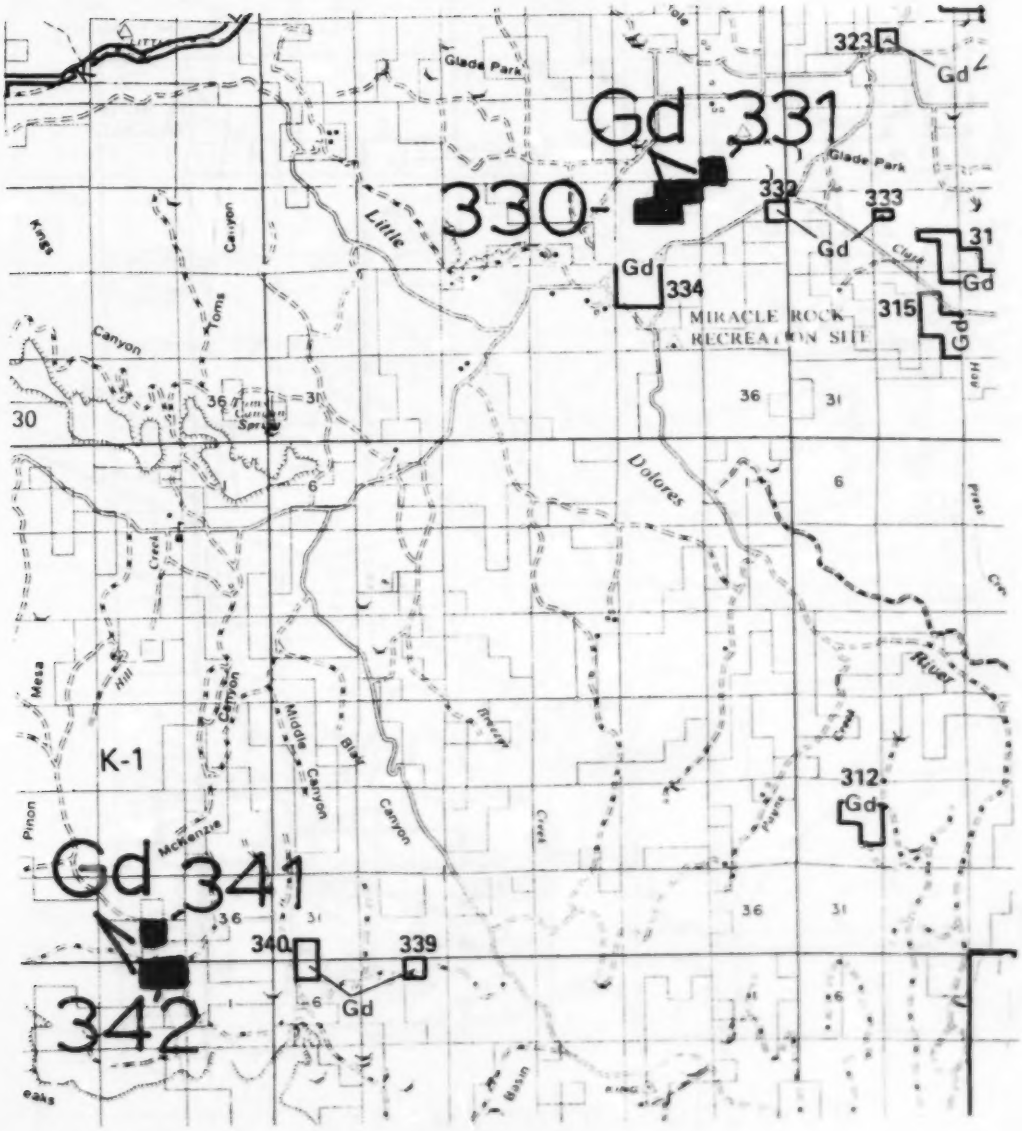


REVISED ADJUSTMENTS

MAP 5 DRAFT RMP EIS

MAP 5

LAND TENURE ADJUSTMENTS

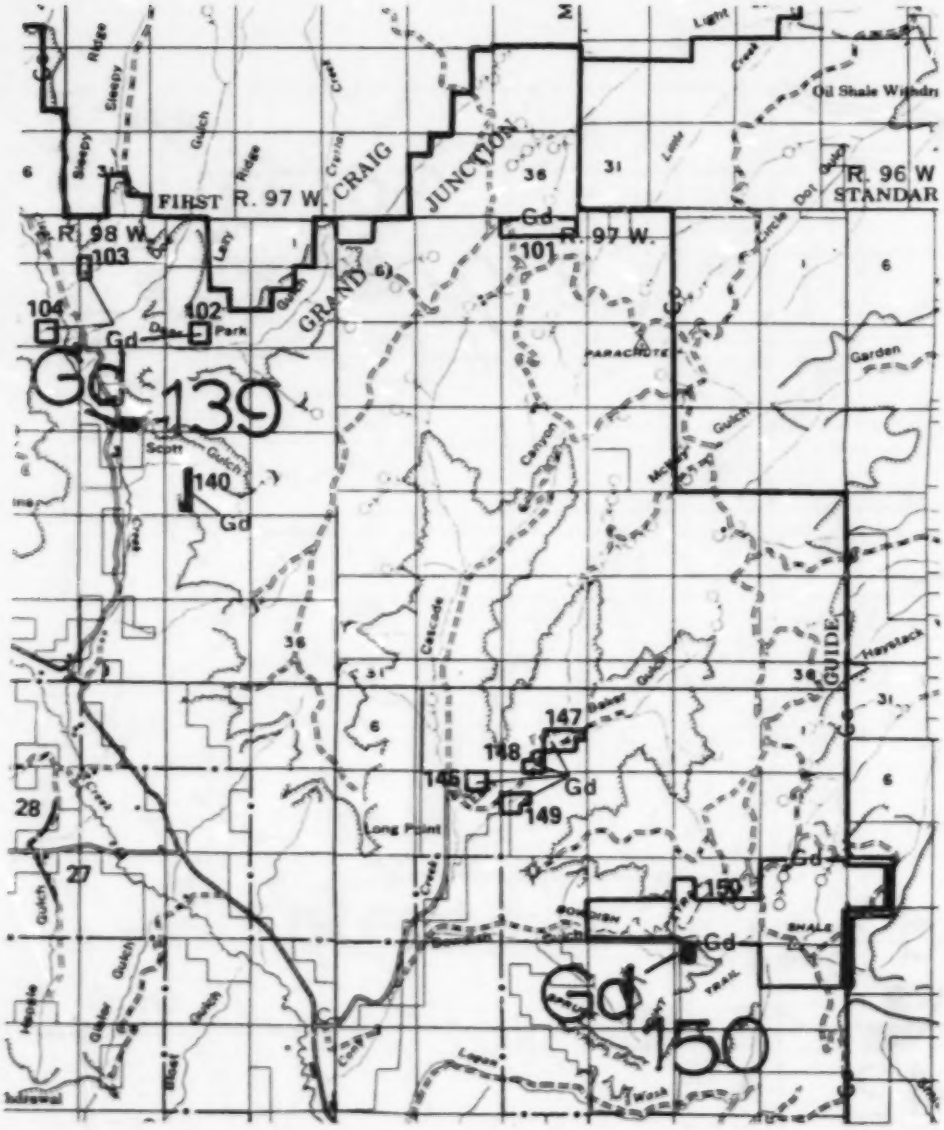


REVISED ADJUSTMENTS

MAP 5 DRAFT RMP EIS

MAP 6

LAND TENURE ADJUSTMENTS

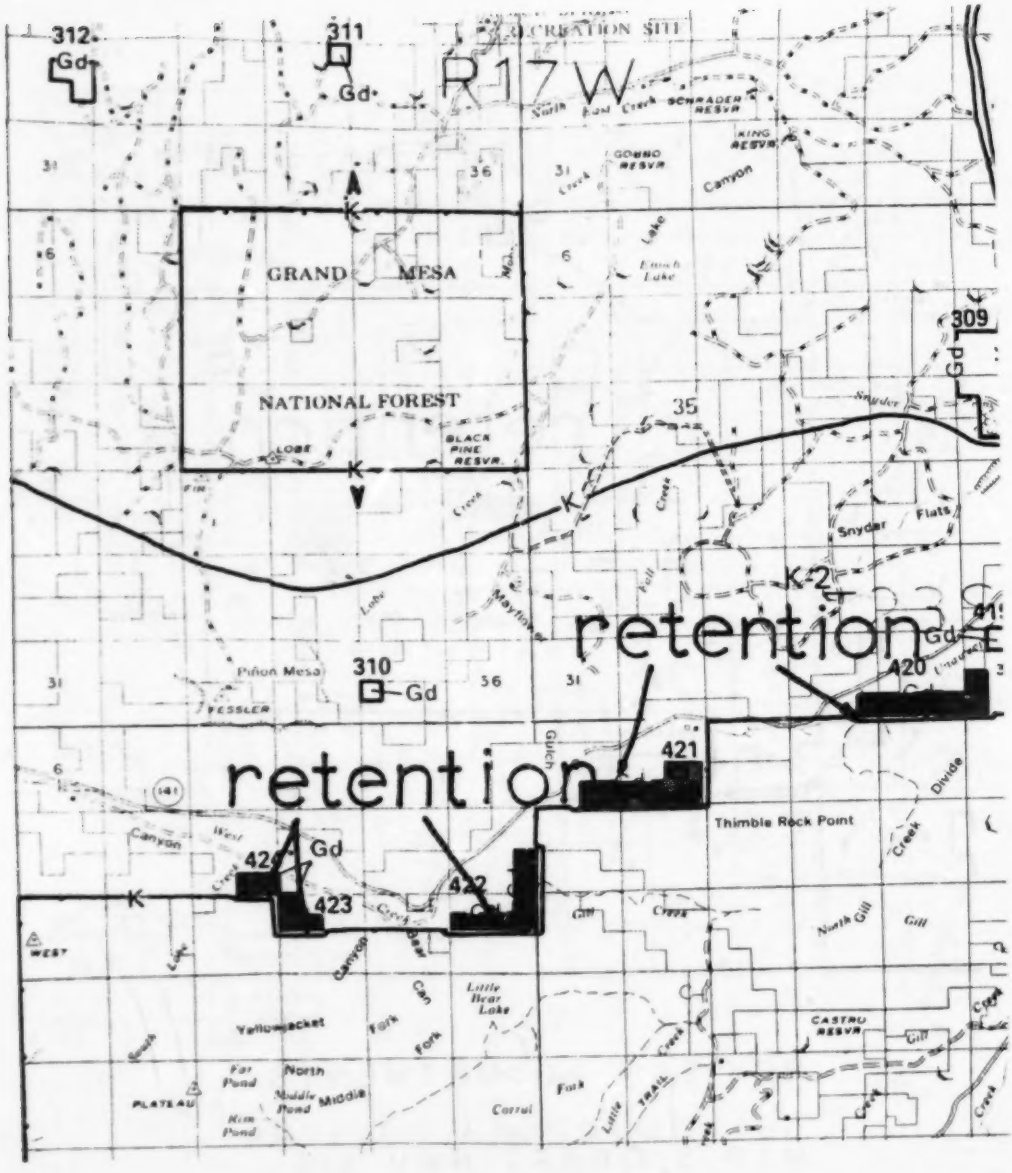


REVISED ADJUSTMENTS

MAP 5 DRAFT RMP EIS

MAP 7

LAND TENURE ADJUSTMENTS

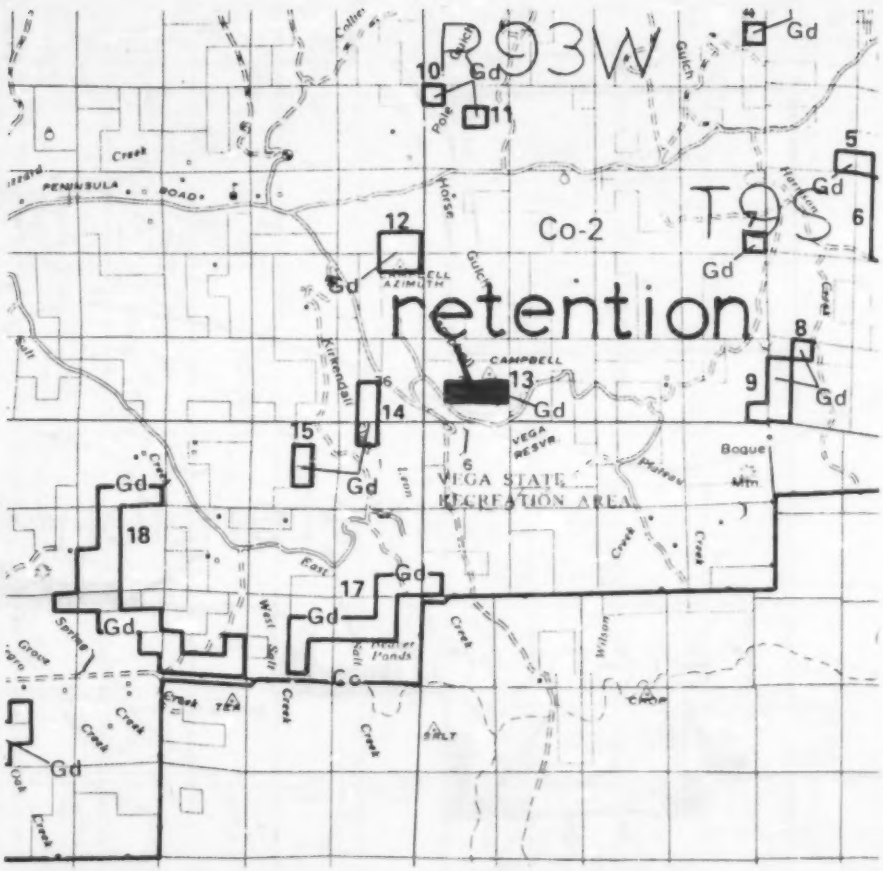


REVISED ADJUSTMENTS

MAP 5 DRAFT RMP EIS

MAP 8

LAND TENURE ADJUSTMENTS

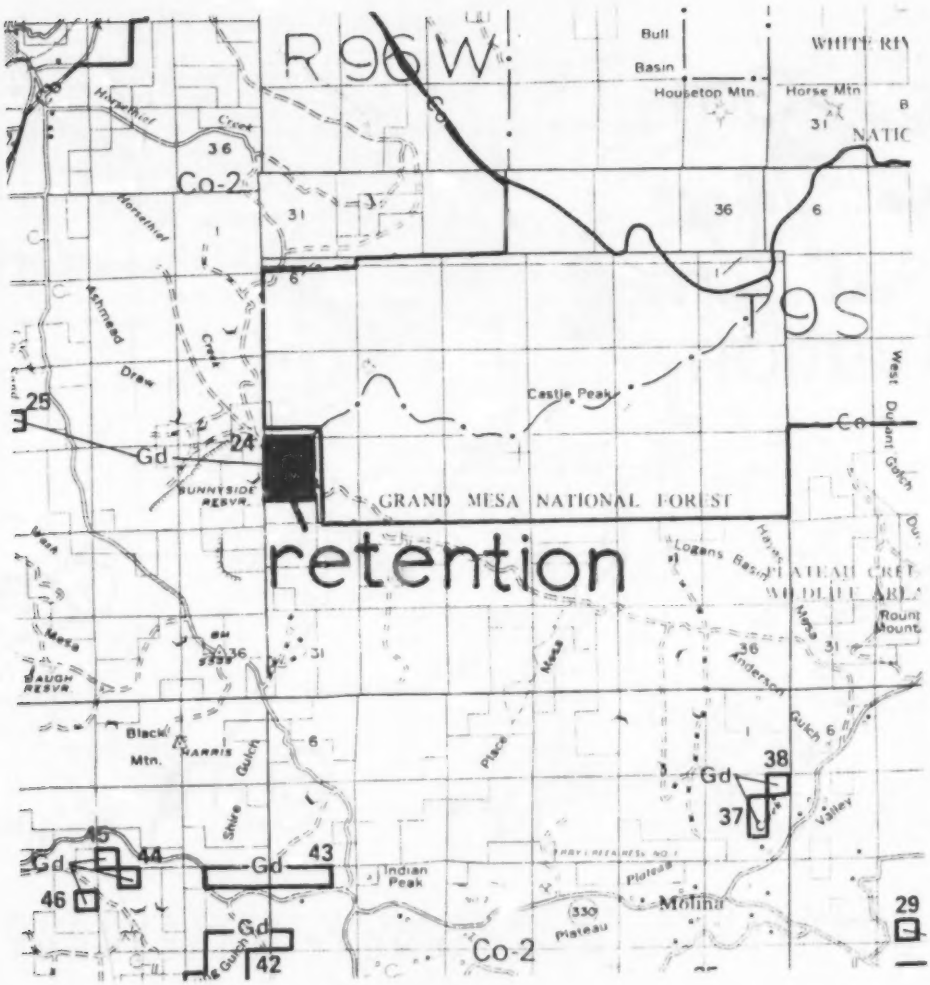


REVISED ADJUSTMENTS

MAP 5 DRAFT RMP EIS

MAP 9

LAND TENURE ADJUSTMENTS

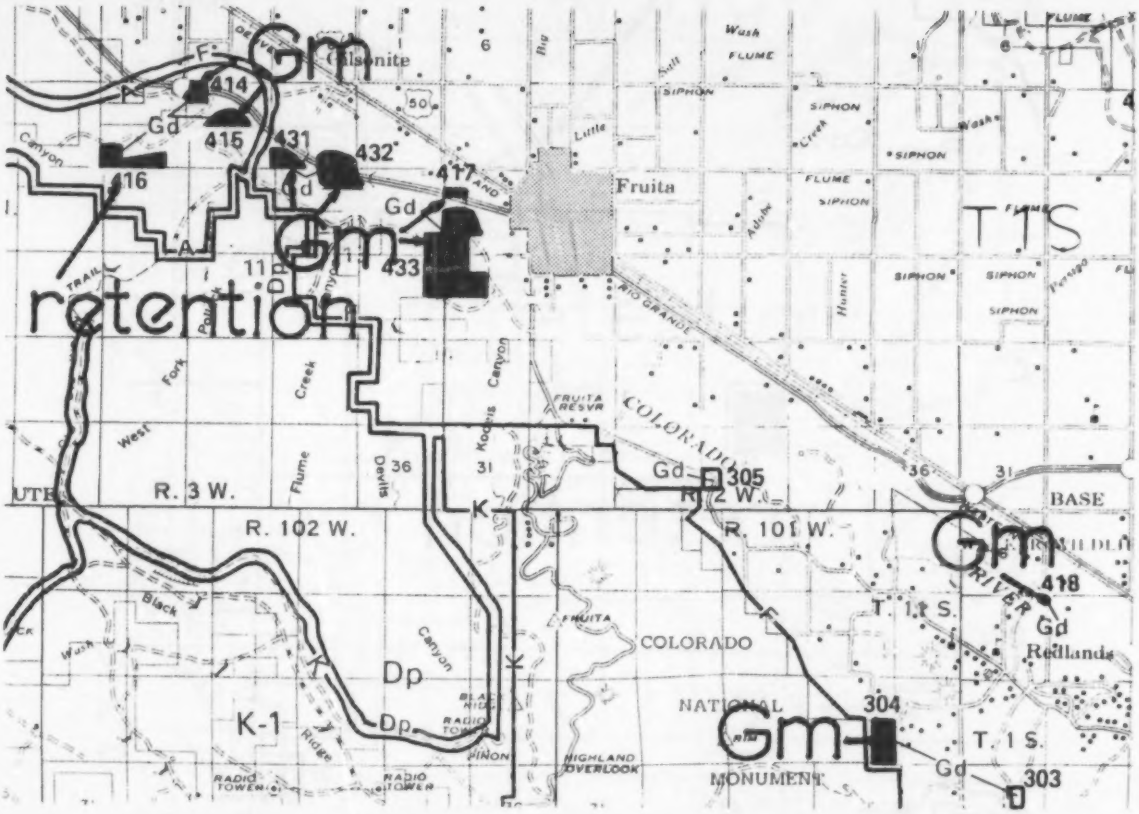


REVISED ADJUSTMENTS

MAP 5 DRAFT RMP EIS

MAP 10

LAND TENURE ADJUSTMENTS



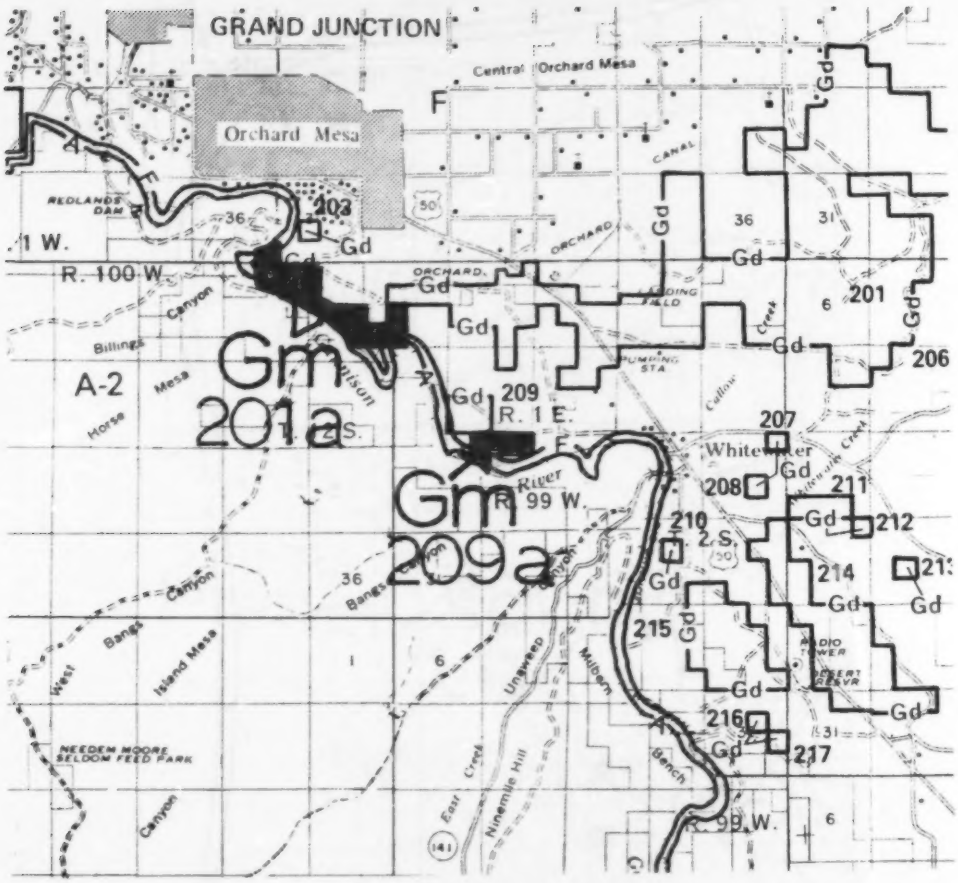
Gm - COOPERATIVE MANAGEMENT AGREEMENT AREAS

REVISED ADJUSTMENTS

MAP 5 DRAFT RMP EIS

MAP 11

LAND TENURE ADJUSTMENTS



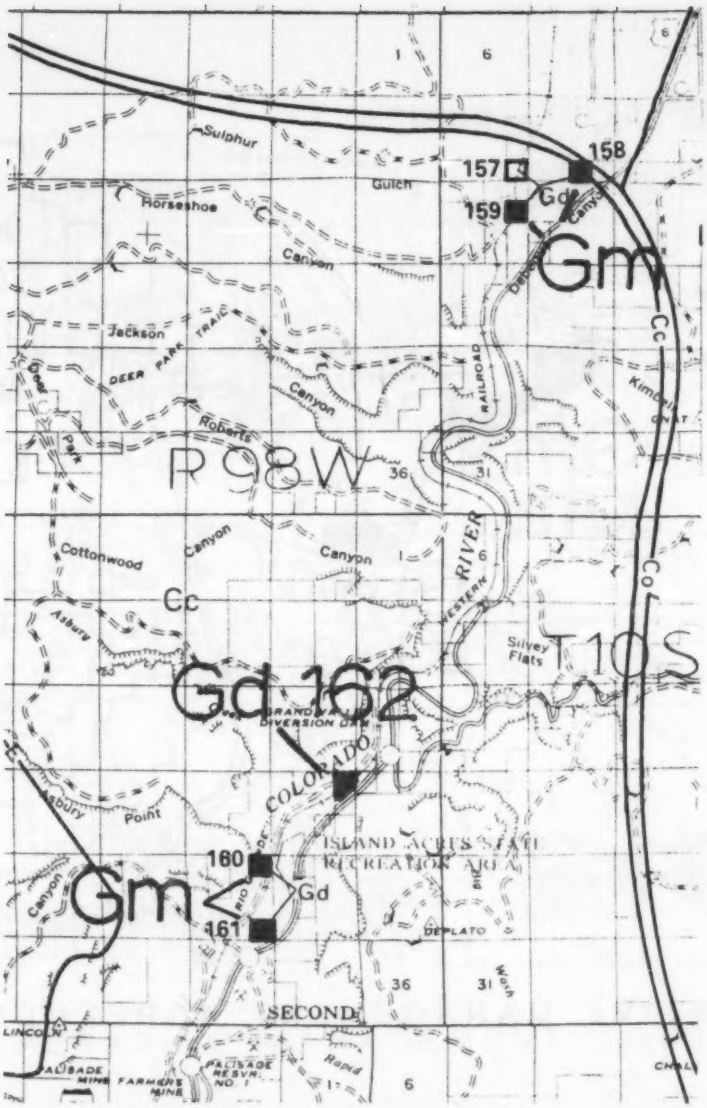
Gm-COOPERATIVE MANAGEMENT AGREEMENT AREAS

REVISED ADJUSTMENTS

MAP 5 DRAFT RMP EIS

MAP 12

LAND TENURE ADJUSTMENTS



Gm-COOPERATIVE MANAGEMENT AGREEMENT AREAS

REVISED ADJUSTMENTS

MAP 5 DRAFT RMP EIS

ERRATA

MAP 12

ERRATA

LAND TENURE ADJUSTMENTS

ERRATA

This section consists of text and map corrections to the draft RMP EIS. These corrections were made as a result of errors found in the draft RMP EIS.

TEXT CORRECTIONS

Table 5 contains minor editorial corrections. The first column indicates the location of the change, and the second column documents the change.

Table 5. Errata (Corrections to Text)

Draft RMP EIS Page Number	Change
	COAL MANAGEMENT
Page 117, Table 3-3, Book Cliffs subsection, Carbonera entry, thickness column	Change "7.5-3.5" to "7.5-8.5"
Page 150, second column, Impacts from Oil and Gas	Delete last sentence in first paragraph and replace with following: "Coal resource recovery is an issue that is analyzed during coal activity planning. Significant loss of the coal resource during oil and gas production would be reviewed and options considered."
	OIL AND GAS MANAGEMENT
Page 106, first column, Oil and Gas	Add to end of first sentence: ", or appropriate stipulations."
Page 228, first column, Interest Groups	Following "Colorado Archaeological Society" add "Rocky Mountain Oil and Gas Association" and "Independent Petroleum Association of Mountain States."
Page 239, first column, first paragraph, second sentence	Add "(Table C-1)" at the end of this sentence.
Page 239, first column, Introduction, third sentence	Change "potential" to "protection."
Page 239, second column, unnumbered paragraph	Insert a "6" at the beginning of this paragraph.
Page 239, second column, paragraphs 6 and 7	Change paragraph numbers from "6" and "7" to "7" and "8," respectively.
Page 240, first column, number 9, second sentence	At end of second sentence, change "peak flow of the drainage" to "flow of a 25-year flood."
Page 240, first column, number 12, fifth sentence	Change "twice" to "one and one-half times."
Page 240, first column, number 12, fourth sentence	Change "cover with" to "cover ¼ to ½ inch deep using."
Page 240, first column, number 12, fifth sentence	Change "October 15" to "October 1" and add "1" between "September" and "and."
Page 240, first and second columns, paragraphs 8, 9, 10, 11, 12, 13, 14, 15, and 16	Change these paragraph numbers to "9, 10, 11, 12, 13, 14, 15, 16 and 17."
Page 240, second column, subparagraph "b," third sentence	Add at the end of this sentence "will cover the diameter of the pipe plus 1 foot."
Page 241, first column, paragraph 17	Delete this paragraph and add the following three standard design practices: "18. Where applicable, known important habitat sites of sensitive animal and plant species and communities will be protected from surface-disturbing activities. "19. A pesticide use proposal must be submitted and approved by the authorized officer prior to the use of any pesticide. "20. Low water crossings will be used during road construction across drainages whenever possible."
Page 242, second column, number 1, second sentence	Change "30 CFR 221.22" to "43 CFR 3162.6."
Page 243, second column	Replace number 6 with the following: "The reserve pit will be fenced on three sides prior to drilling activity and closed off on the fourth side after drilling is finished. All corners will be braced with an H-type brace. The fence construction will be on cut or undisturbed surface. Within deer and elk winter range and within the wild horse range, the reserve pit fence shall be 84 inches high. The bottom 48 inches will be woven wire and the top 36 inches will be three strand of barbed wire. In all other areas, the reserve pit fence shall be four strands of barbed wire or 48-inch woven wire. "Water in reserve pits may be toxic and unsuitable for consumption by animals. Big game and livestock may become trapped in reserve pits when attempting to use them. Fencing will minimize these problems."

Table 5. Errata (Corrections to Text)—Continued

Draft RMP EIS Page Number	Change
Page 245, Table C-1, left column, General, first paragraph	Second sentence following the words "over the," change "distributed" to "disturbed." Third sentence, change "to a depth of 3 inches" to "deeper than the depth to be stripped."
Page 246, third paragraph, third sentence	Delete phrase "...reduce the amount of time to fill and recontour pits." and replace with: "allow faster recontouring."
Page 264, second column, Well Drilling, third paragraph, third sentence	Change "10 feet by 250 feet by 6 feet deep to 30 feet by 100 feet by 15 feet deep" to "100 feet by 250 feet by 15 feet deep to 10 feet by 50 feet by 6 feet deep."
Page 267, stipulation 4	Add a second paragraph: "This stipulation may be waived or reduced in scope if circumstances change or if the lessee can demonstrate that operations can be conducted without causing unacceptable impacts on the concern(s) identified."
Page 267, second column, stipulation 8	Delete "Special."
Page 268, stipulations 13 and 14	Delete stipulations 13 and 14 and replace with new stipulation 13 as follows: "The lessee/operator shall submit a plan for avoidance or mitigation of impacts on the identified species to the authorized officer. This may require completion of an intensive inventory by a qualified biologist. The plan must be approved prior to any surface disturbance. The authorized officer may require additional mitigation measures such as relocation of proposed roads, drilling sites, or other facilities. Where impacts cannot be mitigated to the satisfaction of the authorized officer, surface occupancy on that area must be prohibited."
Page 269, Stipulations, number 15	Change "15" to "14."
FOREST MANAGEMENT	
Page 241, first column, number 17	Delete this paragraph and replace it with the following: "An average of three to seven per acre of the largest nonhazardous snags, particularly those adjacent to openings and aquatic sites (open water), will be left per acre on commercial sales."
CULTURAL RESOURCE MANAGEMENT	
Page 423	Add the following entries to Literature Cited: "Mehls, S. F. 1980. The valley of opportunity: a history of west central Colorado. Cultural resource series 12, Bureau of Land Management, Colorado State Office, Denver, Colorado. "Wormington, H. M. 1955. A reappraisal of the Fremont Culture with a summary of the archaeology of the northern periphery. Proceedings 15, Denver Museum of Natural History, Denver, Colorado. "Denver Museum of Natural History 1956. Archaeological Investigations on the Uncompahgre Plateau in west central Colorado. Proceeding 2, Denver, Colorado. "Lutz, B. J. 1978. The test excavations of 5ME217: a rockshelter in Mesa County, Colorado. The Office of Public and Contract Archaeology, University of Northern Colorado."
RECREATION RESOURCE MANAGEMENT	
Page 49, PA column, second entry (Bang's Canyon/Northeast Creek area), fourth sentence	Change "VRM Class I" to "VRM Class II."
Page 95, first column, Recreation	Delete entire second sentence. In the third sentence, delete "both" and "and private." At the end of the third sentence, add new sentence: "The need to require private boaters to obtain river permits would be analyzed in a recreation management plan for the area."
Page 96, first column, between third and fourth sentences	Add: "The need to require private boaters to obtain river permits would be analyzed in a recreation management plan for the area."
Page 98, second column, fourth full paragraph (Recreation)	Add the following to the end of this paragraph: "The Dominguez Canyon area would be managed for semi-primitive motorized recreation."
Page 103, second column, third full paragraph (Recreation)	Add at the end of this paragraph: "with a semi-primitive motorized setting."
Page 108, first column, Recreation, between second and third sentences	Add: "The need to require private boaters to obtain river permits would be analyzed in a recreation management plan for the area."
OFF-ROAD VEHICLE MANAGEMENT	
Page 97, first column, second full paragraph (Off-Road Vehicles), first sentence	Add the following at the end of the first sentence: "The area around the Dominguez Recreation Site (1,280 acres) would be closed (in conjunction with the U.S. Forest Service road closure) during winter and spring when the roads are wet."

Table 5. Errata (Corrections to Text)—Continued

Draft RMP EIS Page Number	Change
Page 98, second column, fifth full paragraph (Off-Road Vehicles), third sentence	Insert "and Demaree Canyon (21,050 acres)" between "(13,440 acres)" and "would be closed."
Page 105, first column, third full paragraph (Off-Road Vehicles)	Add at the end of this paragraph: "The Lands End area (6,400 acres) would be closed from December 1 to June 1 to protect big game winter range."
VISUAL RESOURCE MANAGEMENT	
Page 107, first column, Visual Resources	Following (2,240 acres) add: "the cliffs in Unaweep Canyon (14,080 acres), and the Dolores River Canyon (16,000 acres)." Following (12,760 acres) add: "the Sinbad Valley bottom (8,960 acres), and the area surrounding The Palisade (16,000 acres)."
Page 108, second column, second full paragraph (Visual Resources), third sentence	Insert the following between "(8,960 acres)" and "would be": "and the area around The Palisade (16,000 acres)."
LAND TENURE ADJUSTMENTS	
Page 56, first column, end of first partial paragraph	Add the following new paragraph: "Approximately 150 acres of public land isolated by an existing Bureau of Reclamation (BR) canal would be identified for disposal when and if the BR revokes their withdrawal. Generally, these lands have potential as agricultural lands and are too small to show on a map. Survey requirements in addition to the problem of revoking the withdrawal would probably delay disposal of these tracts."
Map 5	NE¼NE¼ Sec. 17, T.10S., R.97W. shows as public land (yellow) but should show as private land (white)
FIRE MANAGEMENT	
Page 64, Table 2-22, PA column	Replace "976,790" and "107,880" with "[13]."
Page 64, Table 2-22	Add the following footnote: "[13]The acreage for full and limited response levels will be determined through a fire management activity plan."
Page 64, second column, first partial paragraph, near end of first sentence	Add "or prescribed fire" between "limited suppression" and "areas."
Page 64, between Table 2-22 and second full paragraph	Add the following new paragraph following Table 2-22 and preceding second full paragraph: "The BLM Washington and Colorado State offices are presently developing a new fire management policy. This policy will be used in developing fire management plans for the resource area following completion of the RMP. Fire management objectives as discussed in the emphasis area descriptions (Chapter 2, Preferred Alternative, Emphasis Areas section) will also be used in developing fire management plans. Based on the new fire management policy, the acreage listed under each fire response category in Table 2-22 could change. However, the fire management objectives listed in the emphasis area descriptions will be met.
Page 64, second column, Support	Add the following new sentence: "Support for preparing fire management activity plans would be required from the Grand Junction Resource Area and Colorado State Offices."
Page 68, Table 2-23, Fire Management, Response Levels, items "a" and "b", PA column	Change "976,790" and "108,233" to "[14]."
Page 68, Table 2-23, bottom of table	Add footnote [14]: "[14]The acreage for full and limited response levels will be determined through a fire management activity plan."
Page 97, first column, Fire	Delete the existing narrative and replace with the following: "Portions of this emphasis area would be managed (1) to protect adjacent private property through the prevention of fire spread from public land; (2) to protect tall conifers, riparian areas, cultural resource structures, and improvements such as the Dominguez Recreation Site; or (3) to reduce suppression costs and, as a secondary benefit, increase the vegetative mosaic in the Bang's Canyon area."
Page 99, second column, Fire	Delete the existing narrative and replace with the following: "Portions of this emphasis area would be managed (1) to protect coal outcrops, oil and gas facilities, pumping stations, and other improvements; (2) to minimize potential soil erosion following severe wildfires on steep slopes, protect tall conifers, cultural resource structures, the Palisade municipal watershed, and riparian areas; (3) to reduce equipment damage on hazardous soil slump areas and maintain livestock forage in chainings; or (4) to improve forage conditions for livestock and wildlife in areas to be burned under prescribed conditions."

Table 5. Errata (Corrections to Text)—Continued

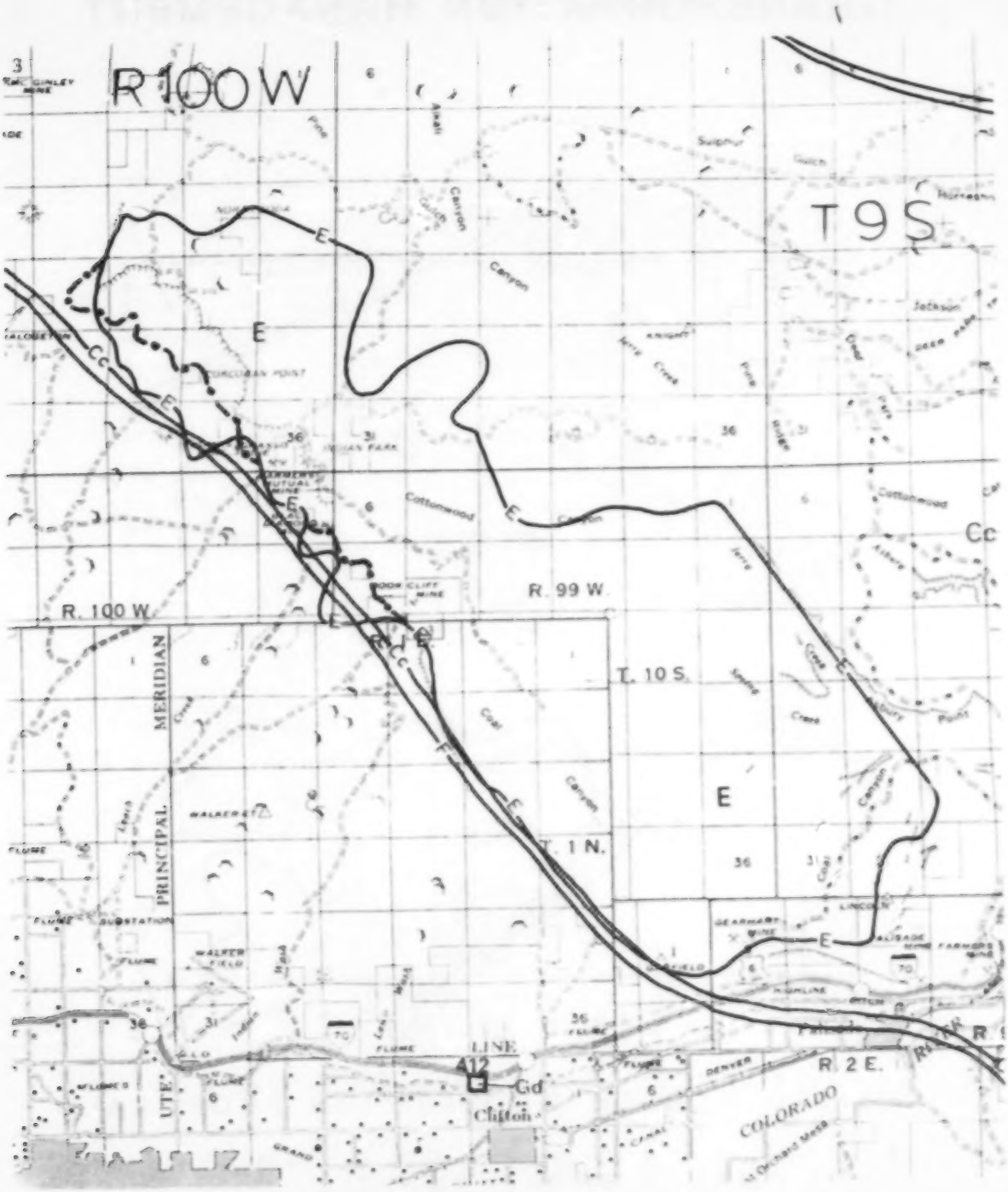
Draft RMP EIS Page Number	Change
Page 100, second column, Fire	Delete the existing narrative and replace with the following: "Portions of this emphasis area would be managed (1) to protect adjacent private property through the prevention of fire spread from public land, protect tall conifers, riparian areas, and cultural resource structures; (2) to protect oil and gas facilities, pumping stations, and other improvements; or (3) to improve forage conditions for livestock and wildlife in areas to be burned under prescribed conditions."
Page 101, second column, Fire	Delete the existing narrative and replace with the following: "Portions of this emphasis area would be managed (1) to protect adjacent private property through the prevention of fire spread from public land, protect riparian areas, and prevent catastrophic fires due to the presence of hazardous fuel types; or (2) to improve forage conditions for livestock on areas to be burned under prescribed conditions."
Page 102, second column, Fire	Add to end of paragraph: "Each designated wilderness area will require the preparation of a fire management plan that identifies the role fire will play in each wilderness ecosystem. These plans will define fire management objectives for a wilderness ecosystem and the acceptable limits of fire behavior and fire effects. Preference of fire management measures and techniques shall be given to the methods and equipment which least alter the landscape or disturb the land surface. Wildfire in Ruby Canyon will be managed under full suppression to protect cottonwood trees and riparian values."
Page 104, first column, Fire	Delete the existing narrative and replace with the following: "Portions of this emphasis area would be managed (1) to reduce fire suppression costs and, as a secondary benefit, increase vegetative diversity; or (2) to protect coal outcrops, oil and gas facilities, and other improvements."
Page 105, second column, Fire	Delete the existing narrative and replace with the following: "Portions of this emphasis area would be managed (1) to prevent fire related damage to the Hollenbeck Reservoir watershed; or (2) to protect adjacent private property through the prevention of fire spread from public land, protect oil and gas facilities, pumping stations, other improvements, coal outcrops, perennial forage resources, riparian areas, and reduce air quality impacts."
Page 106, first column, Fire	Delete the existing narrative and replace with the following: "All public land within this emphasis area would be managed to protect adjacent private property through the prevention of fire spread from public land."
Page 107, second column, Fire	Delete the existing narrative and replace with the following: "Portions of this emphasis area would be managed (1) to protect adjacent private property through the prevention of fire spread from public land, protect timber sale areas, and cultural resource structures; (2) to protect improvements such as the Mud Springs and Miracle Rock recreation sites; (3) to reduce fire suppression costs and, as a secondary benefit, diversify the vegetative mosaic in Granite Creek, Unaweep Canyon, and in The Palisade area; or (4) to improve forage conditions for livestock in areas to be burned under prescribed conditions."
Page 108, second column, Fire	Delete the existing narrative and replace with the following: "Portions of this emphasis area would be managed (1) to protect the area surrounding the Unaweep Seep to reduce equipment damage to resources found within the Unaweep Seep RNA; (2) to minimize potential soil erosion following severe wildfires on steep slopes, protect mining facilities, cultural resource structures, fuelwood sale areas, riparian areas, and tall conifers; or (3) to improve forage conditions for livestock in areas to be burned under prescribed conditions."

MAP CORRECTIONS

Maps 13 through 15 are corrections to Map 5, Draft RMP EIS.

MAP 13

WILD HORSE MANAGEMENT

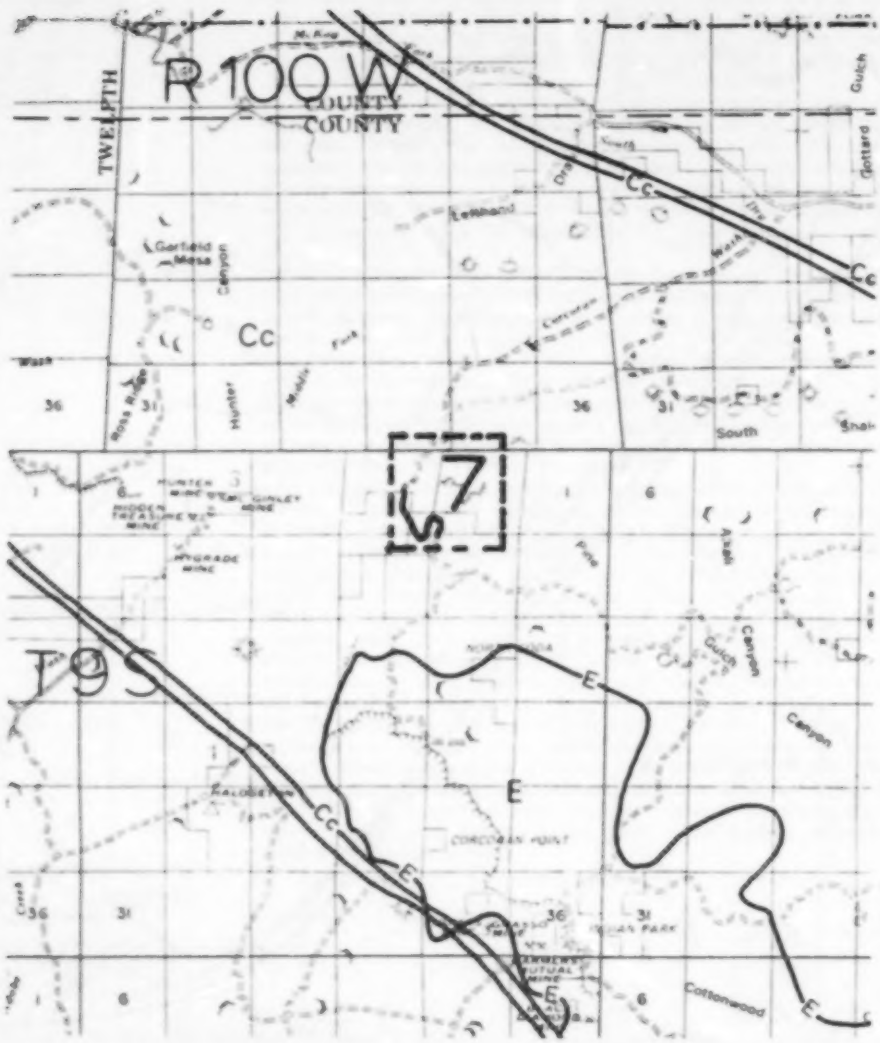


REVISED WILD HORSE AREA BOUNDRY

MAP 5 DRAFT RMP EIS

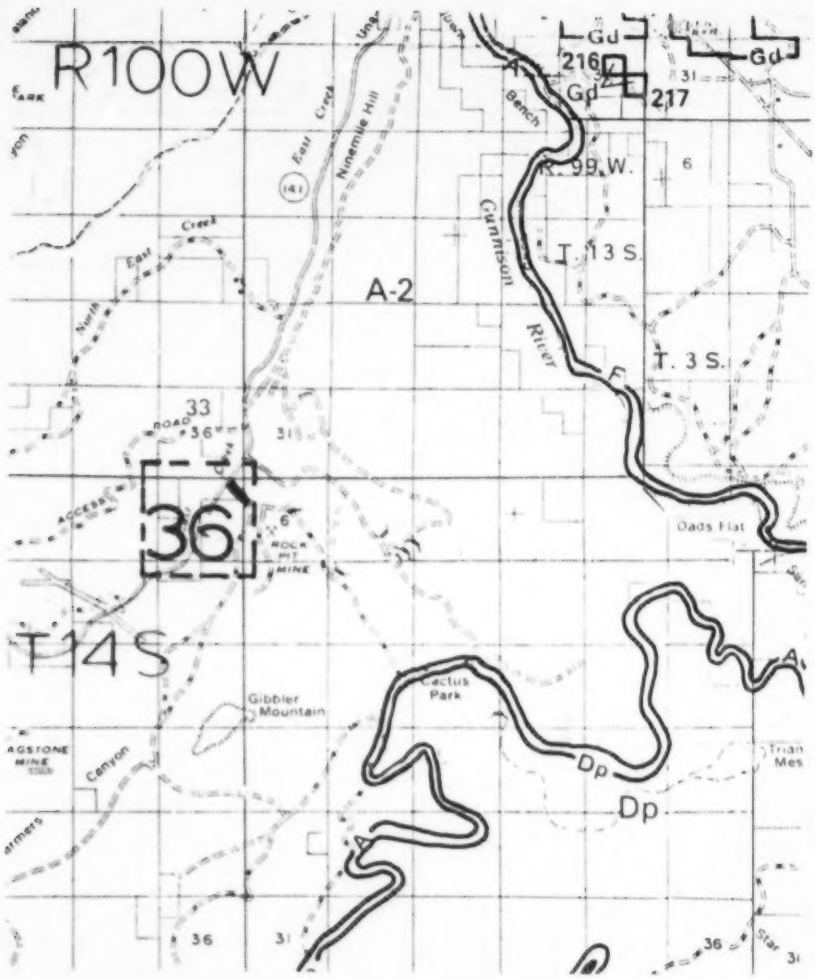
MAP 14

TRANSPORTATION MANAGEMENT


R 100 W
TWELFTH
COUNTY
COUNTY
Garfield Mesa
Canyon
Cc
Cc
Cc
Cc
E
E
E
E
E
E
E
36
31
36
31
6
1
6
1
Hunter
South
Gulch
Canyon
Cottonwood
Gotsard
Axial
Creek
Fork
Wash
Ross Ridge
Hidden Treasure Mine
Upgrade Mine
Hunter Mine
Kelloggs
Corcoran Point
Kelloggs Mine
Kelloggs Canyon
Kelloggs Gulch
Kelloggs Creek
Kelloggs Fork
Kelloggs Wash
Kelloggs Ridge
Kelloggs Mesa
Kelloggs

MAP 15

TRANSPORTATION MANAGEMENT



REVISED ACCESS ACQUISITION PROPOSALS

MAP 5 DRAFT RMP EIS

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